CITY OF OAKLAND

ADMINISTRATIVE INSTRUCTION

SUBJECT/AGENCY	Implementation of the Oakland City Ordinance No. 12324 C.M.S. Section 2.30 of the Oakland Municipal Code, entitled "Equal Access to City Services." / City Administrator's Office	NUMBER	145
REFERENCE		EFFECTIVE	11/9/11
SUPERSEDE			

I.   PURPOSE

The purpose of this Administrative Instruction is to The Oakland Equal Access Ordinance (EAO or Ordinance) was enacted to ensure that Oakland residents, regardless of their English proficiency, have full and equal access to all City services, including many basic and potentially life-saving City services, and that they are able to participate in City government. The Ordinance requires City Departments to hire a sufficient number of bilingual employees in Public Contact Positions, translate vital written documents, and provide recorded telephone messages in languages spoken by at least 10,000 Oaklanders. The purpose of this Administrative Instruction is to ensure that the EAO is implemented, monitored, and enforced.

I. DUTIES AND RESPONSIBILITIES

A.   Equal Access Office

1.   The Equal Access Office shall provide training and technical assistance to Agencies to facilitate implementation of the EAO, monitor Agency and Office of Personnel Resource Management (OPRM) compliance with all aspects of the EAO, and assist the City Administrator in ensuring that the City complies with the EAO.

2.   The Equal Access Office shall cooperate with OPRM to ensure that prior to recruiting or hiring, Agencies determine whether any positions to be filled are Public Contact Positions (PCPs) for which there are an insufficient number of current bilingual employees to serve limited English speakers of languages covered by the EAO (languages spoken by at least 10,000 Oaklanders). If there are an insufficient number of bilingual PCPs, the Equal Access Office and OPRM shall ensure that selective certification is

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used so that limited English speakers will have equal access to City services.

3. The Equal Access Office shall ensure that each Agency furnishes it with a current list of PCPs, organized by Department and location. The Equal Access Office shall ensure that by April 1st of each year, each Agency submits an Agency Compliance Plan (ACP) to the City Administrator and Equal Access Office that provides accurate and complete information, an assessment of Agency and Department compliance with the EAO and a plan for addressing any identified deficiencies.

The Equal Access Office shall assist the City Administrator in preparing an accurate and complete City Administrator Annual Compliance Plan (CAACP).

The Equal Access Office shall ensure that each Agency designates an Agency Language Access Coordinator (ALAC) who is responsible for Agency compliance with the EAO. The Equal Access Office shall make recommendations to Agencies to improve access to Agency services by limited English speakers (LES) of languages covered by the Ordinance.

The Equal Access Office shall ensure that vital documents are translated and that recorded telephone messages are maintained in languages covered by the Ordinance.

B. Agencies

1. Each Agency must comply with the EAO, including the requirements of the EAO to:

   (a) Hire sufficient bilingual employees to meet the needs of limited English speakers who speak languages covered by the EAO.

   (b) Translate vital documents into the languages covered by the EAO.

   (c) Maintain recorded telephone messages in languages covered by the EAO.

   (d) Take interim measures to ensure limited English speakers have access to services when sufficient bilingual employees cannot be hired.

2. By March 1st of each year, each Agency must provide the City Administrator an updated list of PCPs for each of its Departments, organized by location.

3. By April 1st of each year, each Agency must provide the City Administrator and Equal Access Office an annual Agency Compliance Plan that provides accurate and complete information, an assessment of Agency and Department compliance with the EAO and a plan for addressing any identified deficiencies.

4. Each Agency shall designate an existing managerial employee as an Agency Language Access Coordinator (ALAC) to perform duties, described below, that will ensure Agency and Department compliance with the EAO.

5. Each Department within an Agency must comply with the EAO, including the requirements:

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(a) Hire sufficient bilingual employees to meet the needs of limited English speakers of languages covered by the EAO;

(b) Ensure that all vital documents are translated;

(c) Maintain recorded telephone messages in languages covered by the EAO.

(d) Take interim measures to ensure limited English speakers have access to services when sufficient bilingual employees cannot be hired.

6. Agencies shall not recruit or hire for any PCP without first notifying OPRM and the Equal Access Office of their intention to recruit or hire for any PCP.

7. Agencies shall "post notices in the public areas of their facilities in [threshold languages] indicating that translated written materials and staff who speak the languages, are available." These notices shall be "posted prominently" and be "readily visible to the public." § 2.30.050 (D)

C. Agency Language Access Coordinator (ALAC)

1. Each Agency's ALAC shall be responsible for coordinating and ensuring that each Agency and Department complies with the EAO. The ALAC shall report to the Agency head. The ALAC shall be responsible for:

(a) Ensuring that all PCPs are identified;

(b) Ensuring that the selective certification procedure is used to recruit and hire bilingual PCPs if an Agency or Department has insufficient bilingual PCPs;

(c) Coordinating hiring of PCPs with the Equal Access Office and OPRM;

(d) Identifying the need for bilingual PCPs and ensuring that selective certification is used to correct deficiencies in bilingual staffing;

(e) Ensuring that vital documents are translated and disseminated;

(f) Ensuring that recorded telephone messages are available in languages covered by the EAO;

(g) Ensuring that at each location where services are provided there are translated vital documents in languages covered by the EAO that explain how limited English speakers may have equal access to Agency services;

(h) In consultation with the Agency head, preparing the Agency's Compliance Plan;

(i) Ensuring that if insufficient numbers of bilingual employees are available to serve limited English speakers of languages covered by the EAO, equal access to services is nonetheless provided; and

(j)   Training Agency staff to serve limited English speakers.

D.   Office of Personnel Resource and Management (OPRM)

1.   OPRM shall ensure that:

(a)   Before processing any request to hire for a position it ascertains, by using the Agency Compliance Plan, whether the position is a Public Contact Position and if so, whether it must be filled by a bilingual employee in order to ensure that there is a sufficient number of bilingual employees to serve limited English speakers of languages covered by the EAO. If so, it must ensure that selective certification is used in which bilingual skills are an essential qualification for the job. All announcements and descriptions of the positions must indicate that bilingual skills are an essential qualification for the job and selective certification will be used to fill the position. OPRM shall not process any request to hire for a PCP that deviates from these requirements unless it obtains prior written authorization from the City Administrator.

(b)   In order to identify qualified applicants for PCPs, OPRM, shall:

i.   Maintain a list of Bay Area organizations, websites, and institutions serving limited English speakers in languages covered by the Ordinance and send or e-mail job announcements to them.

ii.   Each recruitment and classification specialist will ensure that recruitment efforts maximize the pool of bilingual applicants for PCPs for which there are an insufficient number of bilingual employees to serve limited English speakers.

II. Identification of Need to Hire Bilingual PCPs in Order to Provide LES Persons with Equal Access to Services:

A.   Overview

1.   The EAO defines "public contact position" (PCP) as a "position, whether of a clerical, service, professional or sworn nature, that emphasizes greeting, meeting, contact, or provision of information and/or services to the public in the performance of the duties of that position." § 2.30.020. To comply with the EAO, Departments must "[u]tiliz[e] sufficient bilingual employees in public contact positions [to] provide information and services to the public in each language spoken by the substantial number of limited-English-speaking persons group(s)." § 2.30.030 (A).

2.   The determination of how many bilingual PCPs (BPCPs) are needed in a Department (or if the Department has multiple locations, in a

Department's location) is based on several factors. First, each Department, in conjunction with the Equal Access Office, will identify all Department positions as PCP or non-PCP as set out in Section II.B. Second, using the quantitative and qualitative assessments described in Section II.C, each Department, in conjunction with the Equal Access Office and OPRM, will determine if there are sufficient BPCPs in the Department or location to provide adequate services to LES persons. Finally, each Department, in conjunction with the Equal Access Office and OPRM, shall employ the process described in Section II.D to ensure that there are sufficient BPCPs to provide services to LES persons.

B. Determination of Whether a Position is a PCP

Within sixty (60) days of the signing of this Agreement, the Equal Access Office and each City Agency will review all positions and their geographic locations, to determine whether the positions are PCPs. This information will be provided to OPRM.

By April 1st of each year, the Equal Access Office and each City Agency will review the prior year's list of PCPs, determine whether positions should be added or deleted from the list, and provide a revised list to OPRM.

Agencies and the Equal Access Office will determine if a position is a PCP by answering the three questions below. If the answer is "yes" to any of these three questions, then the position is a PCP.

Questions to Determine if Position is PCP	Yes	No	If yes, then PCP
1. Do the position's regular job duties involve contact with the public?			
2. Do employees who hold this position have contact with the public on a recurring basis even though public contact is not included in the position's job duties? Such recurring contact should be more than only occasional or infrequent.			
3. Should the position be designated a PCP because of other factors? In answering this question, consider the following: a PCP designation is appropriate for positions in a geographic location or Department with only a small number of employees, requiring all employees to have some public contact.			

Analyzing Whether there are Sufficient Bilingual PCPs

1. **Overview:** The EAO defines "sufficient bilingual employees as "the number of employees required to provide the same level of services to limited-English-speaking persons as is available to English-speaking persons seeking any city services." § 2.30.020. To comply with the EAO, Departments must "[u]tiliz[e] sufficient bilingual employees in public contact positions [to] provide information and services to the public in each language spoken by the substantial number of limited-English-speaking persons group(s)." § 2.30.030 (A). All employees including but not limited to classified, exempt, exempt limited duration (ELDE's), temporary contract service employees (TCSE's), and paid interns are covered by the EAO.

2. To meet the sufficient bilingual staffing requirement, each Agency, in conjunction with the Equal Access Office, shall assess by Department whether there are sufficient BPCPs, using the process set out below. Each Agency shall also ensure that the service provided to LES persons by Department is the same quality of service as that provided to English speakers. For example, wait times, service levels and opportunities for communication should be the same. Each Agency shall utilize selective certification if there are insufficient numbers of BPCPs in Departments within its jurisdiction.

3. Exhibit 1 attached, lists the Departments with responsibilities subject to the EAO as of the date of the signing of the *Family Bridges/Echo* Settlement Agreement (See Section II.F and VI). The assessment of whether a Department has a sufficient number of BPCPs to provide equal access to services must be specific to the location where the service is provided.

4. **Quantitative Assessment**
   Using the methodology below, each Department shall make a quantitative assessment of the sufficiency of BPCPs.

   (a) **City Wide**
       Departments that provide City services at a central location, for example, at Frank Ogawa Plaza, shall be deemed to provide city wide services. For these centralized locations the assessment of "sufficient bilingual staffing" shall be performed in the manner set out below and documented in the Agency Compliance Plan, prepared in conjunction with the Equal Access Office:

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(i) Determine the current number of PCPs and the current number of bilingual PCPs (threshold languages separately[3]) employed by the Department at that location.

(ii) Multiply the number of current PCPs by the % of the Spanish or Chinese LES population in the City. The City Administrator determines the LEP population based on current census or other reliable survey data.- The number of bilingual PCPs as calculated above shall be compared with the number of current bilingual PCPs determined in (i) above.

(iii) After completion of the quantitative assessment, continue to the qualitative assessment, described below.

(b) **Community Based Services**

The Equal Access Office and Agencies will identify the Departments that provide services at geographically based locations.

For those services provided at geographically dispersed locations, the quantitative assessment of the sufficiency of BPCPs will be made at each location—i.e., by community center, library, etc. The Equal Access Office will provide data on the percentage of LES persons in the geographic area served at that location. The same process described (in (i) and (ii) above) to determine the quantitative assessment for the "city wide" services will be used for the "community based" services, except that the data on LES persons will be based on the specific geographic location rather than "city wide" data.

5. **Qualitative Assessment**

In addition to the quantitative assessment, each Department must perform a qualitative assessment at least biennially-to determine whether it is providing the same quality of service to LES persons as it provides to English speakers. If the qualitative assessment indicates that LES persons are not receiving or are not likely to receive the same services using the number of bilingual PCPs determined by the quantitative assessment, additional BPCPs must be hired to ensure equal access to the Department's services, but only if vacancies exist to be filled. When the City makes a decision to fill a vacant public contact position, and there is a need for bilingual staff as identified pursuant to the procedures set forth herein, the City is obligated to comply with the requirements of the EAO and this Administrative Instruction in filling the vacancy.

The qualitative assessment may be used to demonstrate that fewer bilingual PCP are needed than determined by the quantitative assessment only if

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[3] For FY 2009-2010, Spanish and Chinese are the languages which meet the EAO threshold. The determination of which languages meet the EAO threshold shall be reviewed and determined on an annual basis.

the Department has documented through the Department survey described below that (1) LES persons use services at a rate significantly lower than the quantitative assessment indicates and (2) that LES persons have not been deterred from using the services because of insufficient bilingual PCPs on staff. The Equal Access Office must certify and approve the assessment. The qualitative assessment shall be included in the City Administrator's Annual Compliance Plan and reviewed by the City Administrator. The City Administrator will determine -annually whether it is feasible, given City staffing, to conduct a qualitative assessment survey, and whether it can be conducted annually or only biennially. That determination and the reasoning in support thereof shall be documented in the annual CAACP. At a minimum, a qualitative assessment survey must be performed every two years.

(a) **Survey**

As part of the City Administrator's Annual Compliance Plan, each Department shall audit and report whether it is providing the same services to LES persons by conducting a survey for the purpose of determining whether additional bilingual staff should be added in order to provide LES persons with the same level of service as English speakers. Such survey should also assess, as indicated by the questions below, whether language access services are adequate and what appropriate strategies to provide services at the same level and scope to LES persons are needed. Each Department shall develop an adequate survey tool, appropriate to the services it provides, receive approval from the Equal Access Office, and submit a copy of the survey instrument and summary of the results and analysis of the survey in the CAACP. The survey results shall be based on documented facts and the survey shall be conducted in a manner sufficient to provide reasonable assurance of the survey's reliability. Questions such as those listed below may be useful as indices of service.

i).   Would the quantitative assessment of BPCPs for the Department result in a sufficient number of BPCPs to provide LES persons the same level of service as English speakers?

ii).   Are there any services that the Department provides to the public that for which LES persons experience a longer wait for service?

iii).   Are there <u>any</u> services that the Department provides that are not available at the same level or scope to LES persons?

iv).   Are some services so specialized that they must be delivered to LES persons by a BPCP and none is currently available to provide that service?

v).   Have LES persons been deterred from seeking any of the Department's services because of a lack of BPCPs? This

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question is best answered through client and community interviews.

D.   **Additional Requirements for Evaluating the Sufficiency of Bilingual PCPs.**

1.   **"Rounding up threshold."** If the quantitative assessment for BPCP need results in 0.5 or higher FTE BPCP, then the City Administrator must round up to the next whole number of FTE BPCPs. (For example, 2.5 must be rounded up to 3). The CAACP shall report on and reflect the "rounding up threshold" for Departments.

2.   Each Department shall rely on the quantitative numerical threshold to determine whether it has sufficient BPCPs, until it completes a qualitative assessment to augment its analysis.

3.   **Departments and/or Positions Designated as "Super PCP."** In order to ensure that limited English speaking persons have sufficient access to certain crucial public services, the City has designated certain Departments identified in Exhibit 2, as "Super PCP Departments." Selective Certification shall be used to ensure that Departments providing certain crucial public services have at least the minimum bilingual staffing set forth in Exhibit 2.

The "Super PCP" designation shall not result in displacement of any existing employees, nor will it trump the Civil Service rules or any Memoranda of Understanding.   Should the next census or other data reveal an increase in the number of limited English speakers of a language other than Spanish or Chinese sufficient to qualify as a threshold language, then the City Administrator may designate additional Departments or positions as "Super PCP." Should the next census or other data reveal a decrease in the number of limited English speakers of a language such that it no longer meets the threshold, then the City Administrator may reallocate "Super PCP" positions or Departments from that language.

E.   **Oakland Police Department (OPD) and Oakland Fire Department (OFD).**

1.   **Overview.** OPD and OFD provide crucial public safety services. OPD and OFD are subject to all of the EAO's provisions and further, the EAO requires that police beats and firehouses in neighborhoods with a significant concentration of LES "Persons Groups" be staffed by a sufficient number of bilingual officers and firefighters. *(See § 2.30.040(b))*

2.   The City represents that existing MOUs control police officer assignments to patrol beats and firefighter assignments to firehouses. For that reason, the following interim provisions regarding those police officers and

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firefighters subject to the MOUs shall be implemented. However, the City recognizes the crucial nature of OPD and OFD services and shall explore every means available to ensure all residents, including LES persons, have full and equal access to these services.

3. **Quantitative and Qualitative Assessment.** OPD and OFD will make a quantitative assessment of the sufficiency of BPCPs for each division (defined as a "Department" in Exhibit 1 for reporting purposes) within OPD and OFD having public contact, using the "city wide" methodology described in Section II.C.4.a. In addition to the quantitative assessment, OPD and OFD must perform a qualitative assessment at least biennially to determine whether they are providing the same quality of service to LES persons as they provide to English speakers as described in Section II.C.5.

4. **Police Beats and Firehouses.** OPD and OFD will make best efforts to ensure that police beats and firehouses located in areas of high LES concentration have bilingual officers and firefighters serving the LES population. If OPD or OFD are unable to do so, OPD and/or OFD in conjunction with the Equal Access Office, will suggest changes that would increase service to the LES population.

5. **Special Reporting Requirements.** OPD's and OFD's determination of the sufficiency of BPCPs will be based on the "city wide" methodology. However, OPD and OFD will include in the Agency Compliance Plans an analysis of the sufficiency of BPCPs based on the location of police beats and firehouses using the "community based" methodology described in Section II.CAb.

6. **OPD shall adopt a Language Access Policy that is issued as a Training Bulletin.** OPD will provide training regarding the language access policy for new recruits and periodically for OPD members. Initial training shall be conducted within 180 days of the adoption of the language access policy.

7. **Outreach.** The Citizens Police Review Board ("CPRB"), in conjunction with the Equal Access Office and OPD, shall develop an outreach program to LES communities in Oakland in the EAO threshold languages regarding the language access policy and the EAO by [fill in the date that is 180 days from the signing of the Settlement Agreement].

8. **Complaints.** Internal Affairs and the CPRB shall develop with the Equal Access Office a method to train its staff to identify and analyze complaints that involve language access, which shall include coordination with and review by the Equal Access Office.

F. **Selective Certification.**

    1.   Any Department that does not have sufficient bilingual employees in Public Contact Positions (BPCPs) as determined by the method described above must utilize selective certification to ensure there are sufficient BPCPs to provide equal service to LES persons. The City Administrator, EAO and OPRM will ensure that selective certification is used when needed. The selective certification process requires that the ability to speak a language covered by the EAO is an essential job requirement for the PCP and only those individuals who speak the language are eligible for hire. Only after making and documenting that best efforts have been made to fill a PCP through the selective certification process and no qualified individuals able to perform all aspects of the job can be hired, may the City Administrator authorize the hiring of an individual who has not been selectively certified.

    2.   The City Administrator may bypass the selective certification process only in the event of a health or safety emergency or a threatened loss of funding that pertains to the position at issue or to hire a TCSE or ELDE while recruitment using selective certification is ongoing. In these limited circumstances, efforts to identify and hire BPCPs shall nonetheless be made. If the City Administrator determines that bypassing the selective certification process is necessary and applies to a large number of PCPs, the City Administrator shall report the rationale for the determination to the Finance and Management Committee at its next meeting. Other deviations from the selective certification process shall be reported to the Finance and Management Committee on a quarterly basis and included in the City Administrator's Annual Compliance Plan.

III.   Interim Measures to Address Insufficient Bilingual PCPs

A.   Whenever there are insufficient bilingual PCPs in a Department but no vacancies exist or whenever necessary to provide equal access to City services, the following should be implemented:

    1.   Agencies must maintain a list of employees who speak the threshold languages. At least one employee who can provide service to LES persons shall be available during business hours. Employees shall have access to telephone language interpretation at all times, and should choose a method for communicating best suited to providing service to LES persons.

B.   All Agencies and Departments must demonstrate that they have adequate means to make all services available to LES persons.

C.   All Agencies will designate an existing employee as a Language Access Coordinators.

D.   All Agencies will adopt and implement Language Access Policies approved by the City Administrator and the Finance and Management Agency.

E.   Each PCP shall be trained in the use of interim measures to assist LES persons.

IV.   Translations of Vital Documents

A.   All vital documents provided to or made available to the public shall be translated into threshold languages.

B.   By [fill in date that is 180 days from the signing of the Settlement Agreement], the Equal Access Office and Agencies shall ensure that all vital documents are translated.

C.   The Equal Access Office and Departments must determine whether any publicly available document created by the Department after [fill in date that is 180 days from the signing of the Settlement Agreement] is a vital document. Vital documents are "written materials that provide vital information to the public about the [D]epartment's services or programs." § 2.30.050 (B). If the document is vital, the document shall be translated into threshold languages no later than thirty (30) days from the date that the document is made publicly available in English. A list of all vital documents and a list identifying newly created documents and specifying dates of translations of the vital documents shall be included in each Agency Compliance Plan.

V.   Recorded Telephonic Messages In Threshold Languages

A.   The Equal Access Office shall ensure that all Departments "maintain recorded telephonic messages in threshold languages." The message is required to contain the following: "basic information about the [Department's operation including, at a minimum, business hours, location(s), services offered and the means of accessing such services, and the availability of language assistance." § 2.30.080.

B.   By [fill in date that is 90 days from the signing of the Settlement Agreement], Agencies shall identify all recorded telephonic messages that are not available to the public in threshold languages and/or identify whether the Department provides the information listed above. A list of such non-complying recorded telephonic messages shall be included in the Agency Compliance Plan, described in Section VI.

C. By [fill in date that is 120 days from the signing of the Settlement Agreement], the Equal Access Office in conjunction with the Agency shall ensure that all recorded telephonic messages are maintained in threshold languages.

VI. Agency Compliance Plans (ACPs)

A. **Overview.** Section 2.30.100 requires that the Annual Compliance Plan prepared by the City Administrator (CAACP), described in Section VII, must provide information at the Department level for all the Departments listed in Exhibit 1. Each Agency, in conjunction with the Equal Access Office, shall prepare an Agency Compliance Plan that shall include all Departments in the Agency. The Agency Compliance Plan shall be submitted to the City Administrator and shall be incorporated into the CAACP. Although the Agency may aggregate the information of all Departments within the Agency's jurisdiction in a single Agency Compliance Plan, individual departmental information shall be included.

    1. An approved example of the ACP form is attached as Exhibit 3. It shall include, but not be limited to, the information required by § 2.30.100 (B)(1)-(16) of the EAO, and shall provide information required to assess and monitor compliance with the EAO, including for example, the provisions requiring access by LES persons to public telephonic messages and vital documents.

    2. It must also provide a narrative assessment and analysis of the Department's compliance with the EAO, deficiencies in compliance and measures or changes necessary to achieve full compliance.

C. Each Agency Compliance Plan shall be provided to the City Council as part of the City Administrator's Annual Compliance Plan and shall be available in the City Administrator's Office.

VII. City Administrator Annual Compliance Plan (CAACP)

A. **Overview:** Section 2.30.100 of the EAO sets forth specific requirements for the City Administrator's Annual Compliance Plan (CAACP) that shall be submitted to City Council by June 1 of each year. The City Administrator shall sign the CAACP certifying that the CAACP complies with the EAO.

B. An approved example of the CAACP form is attached as Exhibit 4. It shall include, but not be limited to, the following:

    1. All information required by § 2.30.100 (B)(1)-(16) of the EAO, and additional information required to assess and monitor the Departments' compliance with all provisions of the EAO.

    2. A list of all Departments.

3. A narrative assessment and analysis of departmental compliance with the EAO, deficiencies in compliance, and measures or changes necessary to achieve full compliance.

4. A description of any measures the City Administrator has used or proposed to achieve full compliance.

5. A report identifying all complaints alleging a violation of the EAO, including the number, nature, and status of the complaints and a narrative description of the resolution or proposed resolution of each such complaint.

C. CAACPs shall be available on the City website and made available upon request in the City Administrator's Office. Summaries of the CAACP shall be available in threshold languages. Notice that the CAACP is available and information stating how to access it shall be posted prominently at each Agency location and on the City's website.

D. The CAACP shall be submitted to City Council by June 1st each year.

For more information please contact the Equal Access Office at (510) 238-6813.

DEANNA J. SANTANA
City Administrator

LIST OF EXHIBITS TO ADMINISTRATIVE INSTRUCTION

LIST OF EXHIBITS TO ADMINISTRATIVE INSTRUCTION

Departments with responsibilities subject to the EAO Exhibit 1 (above) of Settlement Agreement

Departments with "Super PCPs" .... Exhibit 2 (above) of Settlement Agreement

Model Agency Compliance Plan (ACP)...................... Exhibit 4 (above) of Settlement Agreement

Model City Administrator Annual Compliance Plan (CAACP).....Exhibit 5 (above) of Settlement Agreement

1	**EXHIBIT 1: CITY OF OAKLAND DEPARTMENTS SUBJECT TO EAO**
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3	**UNIT** **DEPARTMENT DESIGNATION. * DENOTES "SUPER PCP DEPARTMENTS."**

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5	**AGENCY: City Administrator's Office**	
6	**Unit**	**FOUR DEPARTMENTS**
7	Administration	
8	ADA Programs	
9	Budget Office	
10	Equal Opportunity Programs	
11	Ethics Unit	
12	KTOP Operations	
13	*Administration & Divisions (Tier 2)*	*DEPARTMENT*
14	Citizens Police Review Board	
15	*CAO – CPRB (Non Tier 1 or 2)*	*DEPARTMENT**
16	Equal Access Unit	
17	*CAO – Equal Access (Non Tier 1 or 2)*	*DEPARTMENT**
18	Oaklanders' Assistance Center	
19	*Oaklanders' Assistance Center (Tier 1)*	*DEPARTMENT**
20	**City Administrator's Office (Tier 1 & 2)**	

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22	**AGENCY: City Attorney's Office**	
23	**Unit**	**ONE DEPARTMENT**
24	Administration Excluded Claims	
25	Claims	
26	Litigation	
27	Advisory	
28	*City Attorney's Office (Tier 1 & 2)*	*DEPARTMENT*
29	**City Attorney's Office (Tier 1 & 2)**	

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31	**AGENCY: City Auditor's Office**	
32	**Unit**	**ONE DEPARTMENT**
33	City Auditor Unit	
34	*City Auditor (Non Tier 1 or 2)*	*DEPARTMENT*
35	**City Auditor's Office (Non Tier 1 or 2)**	

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37	AGENCY: City Clerk's Office	
38	**Unit**	
39	City Clerk (1st Floor)	
40	City Clerk (2nd Floor)	
41	City Clerk (Tier 1)	DEPARTMENT
42	**City Clerk's Office (Tier 1)**	

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44	AGENCY: City Council's Office	
45	**Unit**	**ONE DEPARTMENT**
46	Council Administration – Reception Desk	
47	Council Administration Excluded Reception Desk	
48	District One	
49	District Two	
50	District Three	
51	District Four	
52	District Five	
53	District Six	
54	District Seven	
55	Council At Large	
56	City Council's Office (Tier 1 & 2)	DEPARTMENT
57	**City Council's Office (Tier 1 & 2)**	

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59	AGENCY: Community and Economic Development Agency	
60	**Unit**	**TEN DEPARTMENTS**
61	Agency Operations – Other	
62	CEDA Administration	DEPARTMENT
63	Major Projects	
64	Zoning	
65	City Planning – Other	
66	Planning & Zonning	DEPARTMENT"
67	Engineering & Construction – Administration	
68	Project Delivery – Administration	
69	Construction Management & Material Testing	
70	Project Management	
71	Facilities Planning & Development	
72	Surveying	
73	Engineering Design & ROW – Administration	
74	Streets & Structures	
75	Right of Way Management	
76	Sanitary Sewer Design	

Exhibit 1: Departments

77	Watershed & Stormwater Program	
78	Pavement Management	
79	Transportation Services – Administration	
80	Transportation Planning	
81	Traffic Capital Projects	
82	Traffic Safety Program	
83	**Engineering & Design**	**DEPARTMENT**
84	Inspection Services Admin – Other	
85	Inspection Services – Other	
86	Building Inspection – Residential – Other	
87	Engineering Services	
88	Building Inspection – Commercial – Other	
89	District 2	
90	District 3	
91	District 4	
92	Building Codes – Residential – Other	
93	Building Services – Other	
94	Inspection Support	
95	**Building Services**	**DEPARTMENT**
96	Economic Development Director	
97	Workforce Development	
98	Business Development	
99	One Stop Small Business Center	
100	**Economic Development**	**DEPARTMENT**
101	Redevelopment Center	
102	Real Estate	
103	Coliseum Redevelopment	
104	Redevelopment Projects	
105	West Oakland Base Reuse	
106	Downtown Development	
107	Central City East Redevelopment	
108	**Redevelopment**	**DEPARTMENT**
109	HOC Support Staff	
110	Housing Development	
111	CDBG Coordination	
112	Home Ownership Programs	
113	**Housing**	**DEPARTMENT**
114	Municipal Lending	
115	**CEDA – Municipal Lending**	**DEPARTMENT**
116	Residential Rent Arbitration	
117	**CEDA – Residential Rent Arbitration**	**DEPARTMENT**

Exhibit 1: Departments

118	Public Art	
119	Cultural Funding	
120	Marketing	
121	Oakland Film Office	
122	*Marketing & Public Arts (Tier 2)*	*DEPARTMENT*
123	**CEDA (Tier 1 & 2)**	
124		

	AGENCY: Department of Contracting & Purchasing	
125		
126	**Unit**	**ONE DEPARTMENT**
127	Administration	
128	Contract Compliance & Employment Services	
129	Purchasing	
130	Contract Administration	
131	*Contracting and Purchasing (Tier 2)*	*DEPARTMENT*
132	**Contracting and Purchasing (Tier 2)**	
133		

	AGENCY: Finance & Management Agency	
134		
135	**Unit**	**SEVEN DEPARTMENTS**
136	Parking Administration	
137	Meter Operations	
138	Parking Enforcement	
139	*FMA Parking Citation (Tier 1)*	*DEPARTMENT*
140	Litter Fee Ordinance Admin	
141	Rent Adjustment	
142	*FMA Business License Tax (Tier 1)*	*DEPARTMENT*
143	Budget & Finance Admin	
144	Accounting Administration	
145	General Ledger	
146	Payables	
147	Stores Operations	
148	Revenue Administration	
149	Revenue Audit	
150	Risk Management	
151	Treasury Administration	
152	Treasury Operations	
153	Treasury Cashiering	
154	Treasury Payroll	
155	*FMA Treasury (Tier 2)*	*DEPARTMENT*
156	Parking Citation Assistance Center	
157	*FMA – Parking Citation Assistance Center (Tier 1)*	*DEPARTMENT*
158	Business License Tax	

Exhibit 1: Departments

#	Unit	
159	**FMA – Business License Tax (Tier 1)**	**DEPARTMENT**
160	Revenue Collections	
161	**FMA – Revenue Collections**	**DEPARTMENT**
162	Citywide Liens	
163	**FMA – Citywide Liens**	**DEPARTMENT**
164	**Finance and Management Agency (Tier 1 & 2)**	
165		

#	AGENCY: Fire Department	
166		
167	**Unit**	**SIX DEPARTMENTS (For analysis only. One Department for hiring obligations.)**
168	Inspectional Services	
169	**Project Planning & Coordination**	**DEPARTMENT**
170	Fire Communications	
171	Communications Emergency Dispatch	
172	**OFD 911 Dispatch (Tier 1)**	**DEPARTMENT**
173	Emergency Service/Suppression	
174	Airport	
175	**OFD Records Division (Tier 1)**	**DEPARTMENT**
176	Fire Chief	
177	Fire Marshals Office	
178	Certified Unified Program Agency (CUPA)	
179	Arson Investigation	
180	Engineering	
181	Vegetation Management	
182	Budget and Planning Admin	
183	Education and Training Admin	
184	Fire Support & Services	
185	Measure N – Paramedic	
186	**OFD Divisions (Tier 2)**	**DEPARTMENT**
187	Emergency Services Program	
188	**OFD Emergency Services Program (Tier 2)**	**DEPARTMENT**
189	Budget	
190	Accounts Payable	
191	Payroll	
192	Time and Attendance	
193	In-Service Training	
194	Human Resources	
195	Fire Boat	
196	Urban Search-And-Rescue (U.S.A.R.)	
197	EMS Training	
198	**OFD Divisions (Non Tier 1 or 2)**	**DEPARTMENT**

5   Exhibit 1: Departments

199	Fire Department (Tier 1 & 2)	
200		

201	AGENCY: Department of Human Resources Management	
202	Unit	ONE DEPARTMENT
203	Personnel Admin/Human Resource Info Services	
204	Employment and Classification	
205	Employee Relations	
206	Human Resource Development	
207	Employee Benefits Services	
208	Retirement Administration	
209	Department of Human Resources Management (Tier 2)	DEPARTMENT
210	Department of Human Resources Management (Tier 2)	
211		

212	AGENCY: Department of Human Services	
213	Unit	SIX DEPARTMENTS
214	Administration	
215	DHS Administration (Tier 1)	DEPARTMENT
216	Senior Center (Citywide)	
217	West Oakland Senior Center	
218	North Oakland Senior Center	
219	Downtown Oakland Senior Center	
220	East Oakland Senior Center	
221	DHS Senior Centers (Tier 1)	DEPARTMENT
222	Head Start Citywide	
223	Frank G. Mar Head Start	
224	Fannie Wall Head Start	
225	Tassafaronga Head Start	
226	Franklin Head Start	
227	City Towers Head Start	
228	West Grand Head Start	
229	(1266 26th Ave) Head Start	
230	San Antonio Park Head Start	
231	San Antonio CDC Head Start	
232	Sungate Head Start	
233	Manzanita Head Start	
234	Virginia Head Start	
235	Seminary Head Start	
236	(6818 Lion Way) Head Start	
237	Eastmont Mall Head Start	
238	Arroyo Viejo Head Start	
239	85th Avenue Head Start	

Exhibit 1: Departments

240	92nd Avenue Head Start	
241	Brookfield Head Start	
242	Early Childhood & Family Services – Head Start (Tier 1)	DEPARTMENT
243	Linkages Program	
244	Senior Companion Program	
245	Outreach Program	
246	Oakland Paratransit for the Elderly and Disabled	
247	Senior Aide Program	
248	Aging & Adult Services (Tier 2)	DEPARTMENT
249	Youth Services Administration	
250	Year Round Lunch Program	
251	Youth Services	
252	Children & Youth Services and Policy & Planning (Tier 2)	DEPARTMENT
253	Multipurpose Senior Service Program	
254	DHS – Multipurpose Senior Service Program	DEPARTMENT
255	Department of Human Services (Tier 1 & 2)	
256		
257	AGENCY: Department of Information Technology	
258	Unit	ONE DEPARTMENT
259	Administrative Services	
260	Reprographic Services	
261	Customer Support	
262	Planning & Coordination	
263	Technology Installation Services	
264	Network Engineering & Maintenance	
265	Desktop Support	
266	Server maintenance & Support	
267	Project Planning & Coordination	
268	Systems & Database Admin	
269	Systems Operations	
270	Application Development	
271	Geographical Information Systems	
272	Department of Information Technology (Non Tier 1 or 2)	DEPARTMENT
273	DIT (Non Tier 1 or 2)	
274		
275	AGENCY: Library	
276	Unit	SIX DEPARTMENTS
277	Main Library Administration	
278	Art/History/Literature	
279	Magazines and Newspapers	

Exhibit 1: Departments

280	Science Business and Sociology	
281	Childrens Room	
282	Circulation/Automation	
283	**Main Library Local Services**	**DEPARTMENT**
284	Branch Administration	
285	Brookfield Village Branch	
286	Dimond Branch	
287	Eastmont Branch	
288	Elmhurst Branch	
289	MLK Jr Branch	
290	Montclair Branch	
291	Rockridge Branch	
292	Temescal Branch	
293	Bookmobile	
294	Golden Gate Branch	
295	Lakeview Branch	
296	Melrose Branch	
297	Piedmont Branch	
298	West Oakland Branch	
299	African-American Museum & Library	
300	**Branch Library Local Services**	**DEPARTMENT**
301	Director Unit	
302	Financial & Administrative Services Office	
303	Computer Services	
304	Cataloging/Processing	
305	Community Relations	
306	Acquisitions	
307	On-Call Public Services	
308	Literacy	
309	Childrens Services	
310	Teen Services	
311	**OPL Systemwide Services**	**DEPARTMENT**
312	Administrative Unit	
313	**OPL – Administrative Unit**	**DEPARTMENT**
314	Asian Branch	
315	**OPL – Asian Branch**	**DEPARTMENT**
316	Latin American Branch	
317	**OPL – Latin American Branch**	**DEPARTMENT**
318	**Department of Public Library (Tier 1)**	
319		
320	**AGENCY: Mayor's Office**	

Exhibit 1: Departments

		ONE DEPARTMENT
321		
322	Administration Excluded Reception Desk & OAC	
323	Administration – Reception Desk*	
324	**Mayor's Administration (Tier 1 & 2)**	**DEPARTMENT**
325	**Office of the Mayor (Tier 1 & 2)**	
326		

	AGENCY: Museum	
327		
328	Unit	ONE DEPARTMENT
329	Administration Unit	
330	Museum Services Secruity & Operation Unit	
331	Museum Security Services	
332	Museum Custodial Services	
333	Museum Landscape Services	
334	Curatorial Services Unit	
335	Education Unit	
336	**Museum Service (Non Tier 1 or 2)**	**DEPARTMENT**
337	**Oakland Museum (Non Tier 1 or 2)**	
338		

	AGENCY: Office of Parks & Recreation	
339		
340	Unit	NINE DEPARTMENTS
341	Directors Unit	
342	Administrative Servies	
343	Budget and Fiscal	
344	Accounting Unit	
345	Personnel Unit	
346	Area 1 Rec. Center Supervision	
347	Aquatics Supervision	
348	Area 3 Administration	
349	**OPR Administration (Tier 2)**	**DEPARTMENT**
350	Bushrod Recreation Center	
351	Defremery Recreation Center	
352	Golden Gate Recreation Center	
353	Montclair Recreation Center	
354	Mosswood Recreation Center	
355	Poplar Recreation Center	
356	Allendale Recreation Center	
357	Dimond Recreation Center	
358	Franklin Recreation Center	
359	Redwood Heights Recreation Center	
360	Arroyo Recreation Center	
361	Brookdale Recreation Center	

Exhibit 1: Departments

362	Ira Jinkins Recreation Center	
363	Rainbow Recreation Center	
364	Tassafaranga Recreation Center	
365	Sheffield Village Recreation Center	
366	**Recreation Centers (Tier 1)**	**DEPARTMENT**
367	Live Oak Aquatics	
368	Dimond Aquatics (Lions Pool)	
369	Defremery Aquatics	
370	Temescal Aquatics	
371	Fremont Aquatics	
372	Castlemont Pool (CLOSED)	
373	McClymonds Pool (CLOSED)	
374	**Aquatics Unit (Tier 2)**	**DEPARTMENT**
375	Central Reservations	
376	Special Programs	
377	Zoo	
378	Rotary Nature Center	
379	Boating	
380	Tennis	
381	City-Wide Sports	
382	Girls Sports	
383	Youth & Adult Sports	
384	Area One Special Sports Programs	
385	Community Gardens	
386	Feather River Camp	
387	Malonga Casquelourd Center	
388	Studio One	
389	City-Wide Programs Unit	
390	Radical Roving Recreation	
391	Discovery Center	
392	Ball Fields Maintenance	
393	At-Risk Youth	
394	**City Wide Programs (Tier 2)**	**DEPARTMENT**
395	Lincoln Recreation Center	
396	**OPR – Lincoln Recreation Center (Non Tier 1 or 2)**	**DEPARTMENT"**
397	Manzanita Recreation Center	
398	**OPR – Manzanita Recreation Center (Non Tier 1 or 2)**	**DEPARTMENT"**
399	FM Smith Recreation Center	
400	**OPR – FM Smith Recreation Center (Non Tier 1 or 2)**	**DEPARTMENT"**
401	San Antonio Recreation Center	
402	**OPR – San Antonio Recreation Center (Non Tier 1 or 2)**	**DEPARTMENT"**

Exhibit 1: Departments

	Unit	THIRTEEN DEPARTMENTS (For analysis only. One Department for hiring obligations.)
403	Carmen Flores Recreation Center	
404	OPR – Carmen Flores Recreation Center (Non Tier 1 or 2)	DEPARTMENT
405	Office of Parks and Recreation (Tier 1 & 2)	
406		
407	**AGENCY: Police Department**	
408	**Unit**	**THIRTEEN DEPARTMENTS (For analysis only. One Department for hiring obligations.)**
409	Internal Affairs	
410	OPD Interanl Affairs (Tier 1)	DEPARTMENT
411	Police Area 1	
412	Police Area 2	
413	Police Area 3	
414	OPD Patrol (Tier 1)	DEPARTMENT
415	Special Operations	
416	Abandoned Car Removal (Tier 1)	DEPARTMENT
417	Support Operations	
418	Neighborhood Services (Tier 1)	DEPARTMENT
419	Communications Unit	
420	OPD 911 Dispatch (Tier 1)	DEPARTMENT
421	Records Unit	
422	Records & Warrants	
423	OPD Records Division (Tier 1)	DEPARTMENT
424	Traffic BFO	
425	OPD Traffic Division (Tier 1)	DEPARTMENT
426	Animal Shelter	
427	OPD Animal Control (Tier 1)	DEPARTMENT
428	Property/Theft	
429	OPD Property/Theft (Tier 2)	DEPARTMENT
430	Youth & Family Services	
431	OPD Youth & Family Services (Tier 2)	DEPARTMENT
432	Assault	
433	OPD Assault (Tier 2)	DEPARTMENT
434	Office of the Chief – Administration	
435	Bureau of Investigations Admin	
436	Property and Evidence	
437	Identifications Sections	
438	Criminal Investigations	
439	Homicides	
440	CID Targeted Enforcement Task Force	
441	Robbery	

Exhibit 1: Departments

442	Bureau of Services – Administrations	
443	Research, Planning & Crime Analysis	
444	Bureau of Administrations	
445	Police Personnel	
446	Police Information Technology	
447	Backgroud & Recruiting	
448	Bureau of Field Operations-Admin	
449	**OPD Divisions (Tier 2)**	**DEPARTMENT**
450	Public Information	
451	Office of the Inspector General	
452	Special Investingations Internal (Intelligence Division)	
453	Criminalistics	
454	Training Unit	
455	Fiscal Services	
456	**OPD Division (Non Tier 1 or 2)**	**DEPARTMENT**
457	**Oakland Police Department**	
458		
459	**AGENCY: Public Works Agency**	
460	**Unit**	**THREE DEPARTMENTS**
461	Human Resources	
462		
463	Clean Oakland Program	
464	Litter Enforcement	
465	Env Svcs Recycling & Solid Waste	
466	**PWA Divisions (Tier 1)**	**DEPARTMENT**
467	Director and Human Resources Unit	
468	PWA Fiscal Services	
469	Management Info Systems Unit	
470	Infrastructure & Ops Asst Director's Office	
471	Electrical Services Admin	
472	Electrical Maintenance	
473	Electrical Traffic Maintenance	
474	Electrical Engineering	
475	Electrical Projects	
476	Infrastructure Maint Admin	
477	Storm Drain Maintenance	
478	Sewer System Maintenance	
479	Street & Sidewalk Maintenance	
480	Tree Services	
481	Equipment Services Administration	
482	Facilities & Environ Asst. Director's Office	

Exhibit 1: Departments

483	Facility Services Admin	
484	Civic Center Complex	
485	Hall of Justice Complex	
486	Plant Operations	
487	Roving Custodial	
488	Project Design	
489	Parks/Bldg Maint Admin	
490	Landscape Maintenance	
491	Special Services	
492	Bldgs Electrical & Plainting	
493	Bldgs Plumbing & Area Maint	
494	Bldgs Structural	
495	SCGA Admin	
496	Street Cleaning	
497	Graffiti Abatement & Rapid Response	
498	Illegal Dumping	
499	Environmental Services Admin	
500	Env Svcs Environmental Remediation	
501	Env Svcs Sustainability	
502	Env Svcs Watershed Program	
503	Env Svcs Engergy Group	
504	*PWA Divisions (Non Tier 1 or 2)*	*DEPARTMENT*
505	Public Works Call Center	
506	*PWA – Public Works Call Center (Non Tier 1 or 2)*	*DEPARTMENT*
507	**Public Works Agency**	

Exhibit 1: Departments

Exhibit 2: Super PCP Departments

Agency/Department/Position	Bilingual Staff		Notes
City Administrator's Office (Agency)			
1. Equal Access Unit	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed.
2. Citizens Police Review Board	1 SP	1 CH	At least one PCP shall be designated as a Spanish-speaking BPCP and vacancies filled by selective certification if BCPs are needed.
3. Administration – OAC	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed., on the condition that the function and staffing of this office is substantively unchanged.
City Clerk's Office (Agency)			
4. City Clerk (1st Floor)	1 SP	1 CH	At least one Spanish-speaking and one Chinese-speaking employee, shall be easily available to both the clerks' offices at all times during business hours. A schedule setting forth the name and extension of each person shall be available at the clerks' desks.
5. City Clerk (2nd Floor)			
Community and Economic Development Agency			
6. Zoning	1 SP	1 CH	At least one Spanish-speaking and one Chinese-speaking employee shall be available at the (permit and building services) desks to assist the public at all times during business hours.
7. City Planning – Other			
8. Inspection Services Admin – Other	2 SP	2CH	At least one PCP (inspector who works in the field) shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed . In addition, at least one PCP who works internally shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed.
9. Inspection Services – Other			
10. Building Inspection – Residential – Other			
11. Engineering Services			
12. Building Inspection – Commercial – Other			
13. District 2			
14. District 3			
15. District 4			
16. Building Codes – Residential – Other			
17. Building Services – Other			
18. Inspection Support			
19. Municipal Lending	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed.
20. Residential Rent Arbitration	1 SP	1 CH	At least one PCP shall be designated as a

			BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed.

Agency/Department/Position	Bilingual Staff		Notes
Finance & Management Agency			
21. Parking Citation Assistance Center	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed.
22. Business License Tax			At least one Spanish-speaking and one Chinese-speaking employee, shall be easily available to Business License Tax, Revenue Collections, and Citywide Liens at all times during business hours. A schedule setting forth the name and extension of each person shall be available in each Department.
23. Revenue Collections	1 SP	1 CH	
24. Citywide Liens			
Fire Department (Agency)			
25. Fire Communications	1 SP	1 CH	The quantitative analysis shall determine the number of PCP dispatchers that shall be designated as BPCP for each threshold language. In addition to this number of BPCPs, at least one additional PCP dispatcher shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed.
26. Communications Emergency Dispatch			
Department of Human Services (Agency)			
27. Multipurpose Senior Service Program	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed.
Library (Agency)			
28. Administrative Unit			At least one PCP shall be designated as a BPCP for each threshold language in the Main Library and vacancies filled by selective certification if BCPs are needed.
29. Main Library Administration			
30. Art/History/Literature			
31. Magazines and Newspapers	1 SP	1 CH	
32. Science Business and Sociology			
33. Childrens Room			
34. Circulation/Automation			
35. Asian Branch	--	2 CH	At least two PCPs shall be designated as BPCP for Chinese—one for Mandarin and one for Cantonese—and vacancies filled by selective certification if BCPs are needed.
36. Cesar Chavez (formerly Latin American Branch)	1 SP	--	At least one PCP shall be designated as a Spanish-speaking BPCP and vacancies filled by selective certification if BCPs are needed.

Exhibit 2: Super PCP Departments

Agency/Department Position	Bilingual Staff		Notes
Office of Parks & Recreation (Agency)			
37. Lincoln Recreation Center	--	1 CH	At least one PCP shall be designated as a Chinese-speaking BPCP and vacancies filled by selective certification if BCPs are needed.
38. Manzanita Recreation Center	1 SP	--	At least one PCP shall be designated as a Spanish-speaking BPCP and vacancies filled by selective certification if BCPs are needed.
39. FM Smith Recreation Center	1 SP or 1 CH		At least one PCP shall be designated as either a Spanish-speaking or Chinese-speaking BPCP and vacancies filled by selective certification if BCPs are needed.
40. San Antonio Recreation Center	1 SP	--	At least one PCP shall be designated as a Spanish-speaking BPCP and
41. Carmen Flores Recreation Center	1 SP	--	At least one PCP shall be designated as a Spanish-speaking BPCP and vacancies filled by selective certification if BCPs are needed. .
Police Department (Agency)			
42. Communications Unit	1 SP	1 CH	The quantitative analysis shall determine the number of PCP dispatchers that shall be designated as BPCP for each threshold language. In addition to this number of BPCPs, at least one additional PCP shall be designated as a BPCP dispatcher for each threshold language and vacancies filled by selective certification if BCPs are needed..
43. Records Unit	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed.
44. Animal Shelter	1 SP	--	At least one PCP shall be designated as a Spanish-speaking BPCP and vacancies filled by selective certification if BCPs are needed.
Public Works Agency			
45. Public Works Call Center	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and vacancies filled by selective certification if BCPs are needed..

Exhibit 2: Super PCP Departments

Model Agency Compliance Plan Template

<u>**Purpose**</u>

This Agency Compliance Plan (ACP) template is to be used to report compliance with the Equal Access Ordinance (EAO) and Administrative Instruction Number: ___; Reference: xxx. The EAO was enacted to ensure that Oakland residents, regardless of their English proficiency, have full and equal access to all City services, including many basic and potentially life-saving City services, and that they are able to participate in City government. The Ordinance requires City Departments to hire a sufficient number of bilingual employees in Public Contact Positions, translate vital written documents, and provide recorded telephone messages into languages spoken by at least 10,000 Oaklanders. The purpose of the ACP is to collect data necessary, by Agency and Departments within its jurisdiction, to ensure that the EAO is implemented, monitored and enforced. The City Administrator will compile the information from the Agency Compliance Plans into the City Administrator Annual Compliance Plan (CAAP), which will be submitted to the City Council and public.

General Instructions

The term "Department" as used in this Instruction refers to the City Administrator's designated list of Departments (see Exhibit 1), such that the Department shall be assessed by geographic location. Exhibit 2 lists Super PCP Departments as determined by the City Administrator. Each Agency shall submit this form with answers to the Narrative Assessment and the attached tables (Tables 1-10), which collectively is the annual Agency Compliance Plan, to the City Administrator and the Equal Access Office.

The Agency Language Access Coordinator (ALAC), in consultation with the Agency head, shall prepare and disseminate to Agency staff and the City Administrator this Agency Compliance Plan. Each Agency head must certify that the Agency Compliance Plans are accurate and complete.

All annual Agency Compliance Plans shall be posted on the agencies' website and the EAO website and shall be available to the public upon request in each Agency facility.

Agency Head Certification

Provide the following certification that the Agency head has reviewed this Agency Compliance Plan for final approval:

> **I, _____, hereby certify, that I have reviewed and approved this Equal Access Agency Compliance Plan for accuracy and completeness, and adopt the goals specified in this Agency Compliance Plan.**

TABLES 1--10

By completing Tables 1-10 of this Agency Compliance Plan, the Agency will be reporting on specific data necessary to identify Departments' gaps in oral and written language services (§ 2.30.100). After completing Tables 1-10, continue to [PAGE, SECTION] and fill out the Narrative Assessment portion of this Agency Compliance Plan.

TABLE 1: CONTACT INFORMATION

Instructions to Agencies:

Table 1 reports on basic information about the Departments that is relevant to the implementation, enforcement, and monitoring of the Equal Access Ordinance. Fill out the excel sheet, Table 1, by providing:

1. The name of the Departments;

2. The physical address including the floor and room number of the Departments for each geographic location;

3. The name of the Agency head;

4. The name of the Agency Language Access Coordinator (ALAC); the job title of the ALAC; the ALAC's email address;

5. The ALAC's telephone number; and

6. The date the Agency Compliance Plan was submitted to the City Administrator.

TABLE 2: PCP STAFFING 1: CURRENT PCPs BY AGENCY

The Equal Access Ordinance Definition of Public Contact Positions

The EAO defines "public contact position" (PCP) as a "position, whether of a clerical, service, professional or sworn nature, that emphasizes greeting, meeting, contact, or provision of information and/or services to the public in the performance of the duties of that position." § 2.30.020. To comply with the EAO, Departments must "[u]tiliz[e] sufficient bilingual employees in public contact positions [to] provide information and services to the public in each language spoken by the substantial number of limited-English-speaking persons group(s)." § 2.30.030 (A).

Interpretative Guidelines

Agencies and the Equal Access Office will determine if a position is a PCP by answering the three questions below. If the answer is "yes" to any of these three questions, then the position is a PCP.

Questions to Determine if Position is PCP	Yes	No	If yes, then PCP
1. Do the position's regular job duties involve contact with the public?			
2. Do employees who hold this position have contact with the public on a recurring basis even though public contact is not included in the position's job duties? Such recurring contact should be more than only occasional or infrequent.			
3. Should the position be designated a PCP because of other factors? In answering this question, consider the following: a PCP designation is appropriate for positions in a geographic location or Department with only a small number of employees, requiring all employees to have some public contact.			

Instructions to Departments:

1. Within sixty (60) days from the signing of this Agreement, the Equal Access Office and each City Agency will review all positions and their geographic locations, to determine whether the positions are PCPs. This information will be provided to OPRM.

2. By April 1st of each year, the Equal Access Office and each City Agency will review the prior year's list of PCPs, determine whether positions should be added or deleted from the list, and provide a revised list to OPRM.

Table 2 reports on information about the PCPs. Fill out the excel sheet, Table 2, by providing:

1. The name of the Departments;

2. The physical address including the floor and room number of the Departments;

3. The job classification title of the position;

4. The job function of the position;

5. The number of full-time employees (FTEs) in the position;

6. The number of staff in these positions that speak Spanish, Chinese (Cantonese or Mandarin), or another language;

7. The number of staff that receive Bilingual Pay (BLP);

8. The number of staff that have been tested for their language abilities by the City and for each of these numbers provide the designation of Spanish (S), Chinese (C), or Other (O) for languages spoken;

9. The number of new positions this year and for each of these numbers provide the designation of Spanish (S), Chinese (C), or Other (O) for languages spoken;

10. The number of PCPs frozen for this FY [YEAR]; and

11. The number of PCPs vacant for this FY [YEAR];

SUFFICIENT BILINGUAL EMPLOYEES: TABLES 3 AND 4

The Equal Access Ordinance Definition

The EAO defines "sufficient bilingual employees as "the number of employees required to provide the same level of services to limited-English-speaking persons as is available to English-speaking persons seeking any city services." § 2.30.020. To comply with the EAO, Departments must "[u]tiliz[e] sufficient bilingual employees in public contact positions [to] provide information and services to the public in each language spoken by the substantial number of limited-English-speaking persons group(s)." § 2.30.030 (A). All employees including but not limited to classified, exempt, exempt limited duration (ELDE's), temporary contract service employees (TCSE's), and paid interns are covered by the EAO.

Interpretative Guidelines

To meet the sufficient bilingual staffing requirement, each Agency, in conjunction with the Equal Access Office, shall assess by Department whether there are sufficient BPCPs, using the process set out below. Each Agency shall also ensure that the service provided to LES persons by Department is the same quality of service as that provided to English speakers. For example, wait times, service levels and opportunities for communication should be the same. Each Agency shall utilize selective certification if Table 4 below reflects that there are insufficient numbers of BPCPs in Departments within its jurisdiction.

TABLE 3: PCP STAFFING. 1 ANALYSIS OF MEETING BILINGUAL PCPs GOALS FOR FY [CURRENT YEAR]

Instructions to Agencies:

Table 3 will reflect the BPCP goals determined during the prior fiscal year to meet the BPCP staffing gaps. By comparing the actual number of BPCPs hired during this fiscal year with the BPCP goals determined the prior fiscal year, the Agency will determine if the Departments have met their BPCP staffing goals this fiscal year. Fill out the excel sheet, Table 3, by providing:

1. The name of the Departments;

2. The physical address including the floor and room number of the Departments;

3. The job classification title for the PCPs in each Department;

The following determinations only need be made for the total Departments; they need not be determined by job classification.

4. The total BPCPs goals for prior FY [YEAR] as recorded in the last FY [YEAR] DCP, Table 4, in the column entitled, "Total BPCPs Goals for Prior FY [YEAR]."

5. The total numbers of BPCPs filled in the current FY [YEAR] by Department for both Spanish and Chinese as recorded in the current FY [YEAR].

6. The percentage of BPCPs goals met for current FY [YEAR]. This is determined by dividing the numbers in the column entitled, "Bilingual PCPs Filled in FY [YEAR]" by the column entitled, "Total BPCPs Goals for Prior FY [YEAR]."

7. Determine the number bilingual PCPs needed to have met goals for FY [YEAR]. Subtract the numbers from the column entitled "Bilingual PCPs Filled in FY [YEAR]" from the column entitled, "Total BPCPs Goals for Prior FY [YEAR]."

8. Provide the number of consecutive months the Department has not met its BPCP goals. The determination of the number of months that the Department has been out of compliance should include prior fiscal year's months if these months have been consecutive.

TABLE 4: PCP STAFFING 2: BILINGUAL PCPs GOALS ASSESSMENT FOR FY [NEXT YEAR]

Instructions to Agencies:

Table 4 will report the numbers required as determined by this fiscal year by Department of "sufficient bilingual employees," *i.e.*, the number of employees required to provide the same level of services to limited-English-speaking persons as is available to English-speaking persons seeking any city services. This is the number of bilingual PCPs the Department will be held accountable for hiring FY [next year]. Fill out the excel sheet, Table 4, by providing:

1. The name of the Departments;

2. The physical address including the floor and room number of the Departments;

3. The total numbers of Public Contact Positions (PCPs) by Department;

4. The total numbers of Bilingual Public Contact Positions (BPCPs) by Department for both Spanish and Chinese;

5. The percentage of limited English proficient (LEP), for both Spanish and Chinese, in the service area population, where city-wide Departments will use city-wide percentages and local offices will use local office percentages. These percentages are made available to the Departments by the Equal Access Office and the City Administrator.

6. The quantitative component of BPCPs goals for both Spanish and Chinese that is needed to meet the quantitative bilingual staffing component. The quantitative determination must be performed for the office location's geographic service region. To determine this quantitative component of the goals, refer to detailed instructions below.

7. The BPCP goals using the quantitative component for both Spanish and Chinese for FY [YEAR]. To determine BPCP goal using the quantitative component, refer to detailed instructions below.

8. The BPCPs goals using the qualitative component for both Spanish and Chinese for FY [YEAR]. To determine BPCP goals using the qualitative component, refer to detailed instructions below.

9. The total BPCPs goals for both Spanish and Chinese for FY [YEAR]. To determine the total BPCP goals, add the numbers from the column entitled "BPCPs Goals Using Quantitative Component for FY [YEAR]" and "Qualitative Component of BPCPs Goals."

The City Administrator will compile the information from Table 4 and organize Departments by Agency and then include this information in the Annual Compliance Plan, which will be submitted to the City Council and public.

To Determine the "Quantitative Component of Bilingual PCPs Goals" in Table 4

The quantitative determination of BPCPs goals for both Spanish and Chinese is recorded in Table 4, listed in #6 in the instructions above. The calculation must be performed for the office location's geographic service region.

1. **City Wide**

   Departments that provide City services at a central location, for example, at Frank Ogawa Plaza, shall be deemed to provide city wide services. For these centralized locations the assessment of "sufficient bilingual staffing" shall be performed in the manner set out below and documented in the Agency Compliance Plan, prepared in conjunction with the Equal Access Office:

   (iv) Determine the current number of PCPs and the current number of bilingual PCPs (threshold languages separately[4]) employed by the Department at that location. See Table 4.

   (v) Multiply the number of current PCPs by the % of the Spanish or Chinese LES population in the City. The City Administrator, based on current census or other reliable survey data deems the citywide Spanish LES population to be [FILL IN %] and the Chinese LES population to be [FILL IN %]. The number of bilingual PCPs as calculated above shall be compared with the number of current bilingual PCPs determined in (i) above.

   (vi) These figures reflect the quantitative component of the BPCPs goals for both Spanish and Chinese that is needed to meet the quantitative bilingual staffing component. Fill in these figures in Table 4, in the column entitled "Quantitative Component of BPCPs Goals."

   (vii) After completion of the quantitative assessment, continue to the qualitative assessment, described below.

2. **Community Based Services**

   The Equal Access Office and Agencies will identify the Departments that provide services at geographically based locations.

   (a) For those services provided at geographically dispersed locations, the quantitative assessment of the sufficiency of BPCPs will be made at each location—i.e., by community center, library, etc. The Equal Access Office will provide data on the percentage of LES persons in the geographic area served at that location. The same process described (in (i) and (ii) above) to determine the quantitative assessment for the "city wide" services will be used for the "community based" services, except

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[4] For FY 2009-2010, Spanish and Chinese are the languages which meet the EAO threshold. The determination of which languages meet the EAO threshold shall be reviewed and determined on an annual basis.

that the data on LES persons will be based on the specific geographic location rather than "city wide" data.

(b) These figures reflect the quantitative component of the BPCPs goals for both Spanish and Chinese that is needed to meet the quantitative bilingual staffing component. Fill in these figures in Table 4, in the column entitled "Quantitative Component of BPCPs Goals."

To Determine the "Bilingual PCPs Goals Using Quantitative Component for FY [YEAR]" in Table 4

The bilingual PCPs' goals needed to meet staffing gaps using the quantitative component for both Spanish and Chinese for FY [YEAR] recorded in Table 4, listed in #7 in the instructions above.

1. **All Departments (City-wide and Local):** Compare the number of required bilingual PCPs as calculated in Table 4, column entitled "Quantitative Component of BPCPs Goals" (#6 in instructions above) with the number of total bilingual PCPs as recorded in Table 4, column entitled "Total BPCPs" (#4 in instructions above).

2. Subtract the numbers in the column entitled "Quantitative Component of BPCPs Goals" from the numbers in the column entitled "Total BPCPs."

3. The difference is the number of bilingual PCP vacancies to be filled through selective certification. These figures should be recorded in Table 4, column entitled "BPCPs Goals Using Quantitative Component for FY [YEAR]" (#7 in instructions above).

4. If the number of current bilingual PCPs is the same or larger than the BPCPs goals, record "0" in Table 4, column entitled "Bilingual PCPs Goals Using Quantitative Component for FY [YEAR]," then turn to the qualitative component of the assessment to determine if there is a need for additional bilingual staffing.

5. If the quantitative assessment for BPCP need results in 0.5 or higher FTE BPCP, round up to the next whole number of FTE BPCPs. (For example, 2.5 must be rounded up to 3). The ACP shall report on and reflect the "rounding up threshold" for Departments.

6. Each Department shall rely on the quantitative numerical threshold to determine whether it has sufficient BPCPs, until it completes a qualitative assessment to augment its analysis.

To Determine the "Qualitative Component of BPCPs Goals" in Table 4

Departments must assess the adequacy of service to LEP populations. (*See* § 2.30.100 (B) (15)). The qualitative component of BPCPs goals is recorded in Table 4, listed in #8 in the instructions above. The assessment and survey below will be summarized in narrative form in the Narrative Assessment Section @.

7. **Qualitative Assessment**

In addition to the quantitative assessment, each Department must perform a qualitative assessment at least biennially to determine whether it is providing the same quality service to LES persons as it provides to English speakers. If the assessment indicates that LES persons are not receiving or are not likely to receive the same services, additional BPCPs must be hired to ensure equal access to the Department's services. The qualitative assessment may be used to demonstrate that fewer bilingual PCPs are needed than determined by the quantitative assessment only if the Department has documented through the Department survey described below that (1) LES persons use services at a rate significantly lower than the quantitative assessment indicates and (2) that LES persons have not been deterred from using the services because of insufficient bilingual PCPs on staff. The Equal Access Office must certify and approve the assessment. The qualitative assessment shall be included in the City Administrator's Annual Compliance Plan and reviewed by the City Administrator. -The City Administrator will determine -annually whether it is feasible, given City staffing, to conduct a qualitative assessment survey, and whether it can be conducted annually or only biennially. That determination and the reasoning in support thereof shall be documented in the annual CAACP.

(a) **Survey**

As part of the City Administrator's Annual Compliance Plan, each Department shall audit and report whether it is providing the same services to LES persons by conducting a survey for the purpose of determining whether additional bilingual staff should be added in order to provide LES persons with the same level of service as English speakers. Each Department shall develop an adequate survey tool, appropriate to the services it provides, receive approval from the Equal Access Office, and submit a copy of the survey instrument and summary of the results and analysis of the survey in the CAACP. The survey results shall be based on documented facts and the survey shall be conducted in a manner sufficient to provide reasonable assurance of the survey's reliability. Questions such as those listed below may be useful as indices of service.

i). Would the quantitative assessment of BPCPs for the Department result in a sufficient number of BPCPs to provide LES persons the same level of service as English speakers?

ii). Are there any services that the Department provides to the public that for which LES persons experience a longer wait for service?

iii). Are there any services that the Department provides that are not available at the same level or scope to LES persons?

iv). Are some services so specialized that they must be delivered to LES persons by a BPCP and none is currently available to provide that service?

v). Have LES persons been deterred from seeking any of the Department's services because of a lack of BPCPs? This question is best answered through client and community interviews.

2. **To Determine the "Total BPCPs Goals FY [YEAR]" in Table 4**

To determine the total BPCP goals, add the columns entitled "BPCPs Goals Using Quantitative Component for FY [YEAR]" and "Qualitative Component of BPCPs Goals." When the goal shows that BPCPs are needed within a Department, selective certification must be used when filling any PCP vacant position(s) the City decides to fill.

3. **Table 5: Additional Requirements for Evaluating the Sufficiency of BPCPs.**

(a) **Departments and/or Positions Designated as "Super PCP."** In order to ensure that limited English speaking persons have sufficient access to certain crucial public services, the City has designated certain Departments as "Super PCP Departments." Selective Certification shall be used to ensure that these Departments have at least the minimum bilingual staffing as set forth in the Administrative Instruction. The City Administrator may designate additional Departments as "Super PCPs" and will inform Agencies of any additions through the Equal Access Office. Provide a report on Super PCP Departments Using Table 5.

(b) OPD and OFD are subject to special assessments and shall coordinate with the Equal Access Office and the City Administrator to meet the EAO's requirements.

TABLE 6: TRANSLATION.1 ALL VITAL DOCUMENTS IN DEPARTMENT AND TABLE -6A: PUBLIC DOCUMENTS DETERMINED TO BE NON-VITAL

The EAO requires that the City Administrator "establish an in-house [court-certified or accredited] translation service . . . for the purpose of translating written materials for city [D]epartments . . . or professional services may be contracted out to an accredited translation contractor" (§ 2.30.050 (A)). Departments are required to translate "written materials that provide vital information to the public about the [D]epartment's services or programs." (§ 2.30.050 (B)).

Written materials include, but are not limited to:

- brochures;
- outreach materials;
- applications or forms to participate in a department's program or activity or to receive its benefits or services;
- written notices of fines or rights to, determination of eligibility of, award of, denial of, loss of, or decrease in a benefit, city service or program, including the right to appeal any department's decision;
- written tests that test competency for a particular license or skill for which knowledge of written English is not required;
- notices advising limited English proficient persons of free language assistance; materials explaining a Department's services or programs;
- complaint forms;
- or any other written documents (e.g., City Web Pages and downloadable materials) that have the potential for determining eligibility for, or access to, services from, or participating in a program of a city department. (§ 2.30.050).

In addition, Departments "shall ensure that their translations are made by a certified translator and that materials are accurate and appropriate for the target audience. Translations should match literacy levels of the target audience." (§ 2.30.050 (E)). "Departments are encouraged to solicit feedback on the accuracy and appropriateness of translations from bilingual staff at community groups whose clients receive services from the department." (§ 2.30.050 (E)).

The EAO also requires that Departments maintain an adequate stock of readily available translated materials from state and federal agencies. (§ 2.30.060).

Instructions to Agencies:

Create Table 6.A, which shall list all public documents which are determined not to be vital documents as defined above. Table 6 only reports on the translation of vital documents. Fill out the excel sheet, Table 6, by providing:

1. The name of the Department;

2. The name of the vital document, including the document ID number;

3.   Indicate "yes" or "no" as to whether the document has been translated into The threshold language;

For any documents that have already been translated into the threshold language prior to this fiscal year and for which reporting was provided, the following questions may be skipped if they are overly burdensome to answer. If the document was translated this year or the document has not been translated, then answer the following questions.

4.   If the document was translated into the threshold language, indicate the date it was translated; if the document was not translated into The threshold language, indicate the date scheduled for translation;

5.   If the document has been checked for accuracy in the threshold language, provide the name of the translator and his or her job classification; if the document has not been checked for accuracy in the threshold language, then answer "no."

6.   If the document was checked for accuracy in the threshold language, indicate the date it was checked for accuracy; if the document was not checked for accuracy in the threshold language, indicate the date scheduled for checking for accuracy;

7.   If the document has received community feedback regarding the translation in the threshold language, provide the name of the community person and his or her community organization; if the document has not received community feedback regarding the translation in the threshold language, then answer "no."

8.   If the document received community feedback in the threshold language, indicate the date it received community feedback; if the document has not received community feedback in The threshold language, indicate the date scheduled for receiving community feedback;

TABLE 7: TRANSLATION.2 SUMMARY OF VITAL DOCUMENTS IN DEPARTMENT

Instructions to Agencies:

Table 7 summarizes the vital documents translated. Fill out the excel sheet, Table 6, by providing:

1. The name of the Departments;

2. The number of vital documents;

3. The number of total documents translated into Spanish;

4. The percentage of total documents translated into Spanish;

5. The number of total documents translated into Spanish which have been checked for accuracy;

6. The percentage of total documents translated into Spanish which have been checked for accuracy;

7. The number of total documents translated into Spanish which have received community feedback;

8. The percentage of total documents translated into Spanish which have received community feedback;

9. The number of total documents translated into Chinese;

10. The percentage of total documents translated into Chinese;

11. The number of total documents translated into Chinese which have been checked for accuracy;

12. The percentage of total documents translated into Chinese which have been checked for accuracy;

13. The number of total documents translated into Chinese which have received community feedback;

14. The percentage of total documents translated into Chinese which have received community feedback.

TABLE 8: ASSESSMENT OF MULTILINGUAL TELEPHONE MESSAGES

The Equal Access Office shall ensure that all Departments "maintain recorded telephonic messages in [threshold languages]." The message is required to contain the following: "basic information about the [D]epartment's operation including, at a minimum, business hours, location(s), services offered and the means of accessing such services, and the availability of language assistance." § 2.30.080.

Instructions to Agencies:

Table 8 assesses the Departments' recorded telephone messages. Fill out the excel sheet, Table 8, by providing:

1. Provide the Department's public phone numbers.

2. For each of the Department's public phone numbers, has the Department recorded a message in Spanish? In Chinese? Answer "yes" or "no" as appropriate.

3. Does the message in Spanish contain basic information about the Department's operation including, at a minimum, business hours, location(s), services offered and the means of accessing such services, and the availability of language assistance? In Chinese? Answer "yes" or "no" as appropriate.

4. If the answer is "no" to any component of the above, provide the number of months the Department has not met its goals.

5. If the message has been recorded in Spanish and Chinese, indicate the date it was recorded; if the message has not been recorded in Spanish and Chinese, indicate the date scheduled to complete recording.

TABLE 9: OPRM BILINGUAL PUBLIC CONTACT POSITION RECRUITMENT SUMMARY. 1

Instructions:
Fill out the excel sheet, Table 9, by providing:

1. The total number of BPCPs designated to be recruited by the recruiting firm.

2. The number of BPCPs filled in this fiscal year by language.

3. The number of BPCPs that remain unfilled.

4. The percentage of BPCPs hired that meet designated goals.

5. Provide a copy of each of the qualified applicants pool lists for each PCP filled, identifying whether each applicant had bilingual capabilities. Attach as appendix @. (*See* § 2.30.100 (B)(6)).

TABLE 10: OPRM BILINGUAL PUBLIC CONTACT POSITION RECRUITMENT SUMMARY. 2

Instructions:
Fill out the excel sheet, Table 10, by providing:

1. The name of the Department in which the BPCP, who was recruited by the recruiting firm, was hired into.

2. The address of the Department in which the BPCP, who was recruited by the recruiting firm, was hired into.

3. The job classification of the BPCP who was recruited by the recruiting firm.

4. The language of the BPCP who was recruited by the recruiting firm.

5. The date the BPCP, who was recruited by the recruiting firm, filled the job.

6. The name of the recruitment firm which recruited the BPCP.

NARRATIVE ASSESSMENT

1. Describe the process that OPRM utilizes before processing any Department personnel request for PCPs, including any deviations that were used in the preceding year.

2. Provide a list of Bay Area organizations serving Spanish-speaking and Chinese-speaking populations to which OPRM posts job announcements. Attach as Appendix @.

3. Provide a list of ethnic language media to which OPRM posts job announcements. Attach as Appendix @.

4. Identify the employee whose sole duty will be to identify recruits and assist them with job applications.

5. Identify any structural barriers to hiring BPCPs and provide recommendations for addressing them.

Table 1: All Public Contact Departments

Department (Unit of Analysis)	Address (Include Floor and Room)	Agency Head	Department Language Access Coordinator (DLAC)	Title of DLAC	Email address of DLAC	Tel. no. of DLAC	Date Department Compliance Plan submitted to City Administrator

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Table 2: PCP Staffing 1: Current PCP's by Agency

Department (Unit of Analysis)	Address (Include Floor and Room)	Job Classification Title	Job Function	FTEs	Spanish	Chinese	Other Lang.	BLP (S, C, O)	Tested (S, C, O)	New (S, C, O)	Frozen	Vacant	Total PCPs Filled in FY [CURRENT YEAR]
Department A, Office 1	1661 Oak Street, Oakland, CA 94607	Secretary I		2	1	1	1	0	1S; 1C	1C	0	1	1
Department A, Office 2	2000 12th Street, Oakland, CA 94607	File clerk I		0	0	1	0	0	1C	0	0	0	0
"	"	Receptionist		0	0	0	0	0	0	0	0	1	1
			Total Department										5
			Total Agency										15

Exhibit 4: Model Agency Compliance Plan Template

Final (March 17, 2011)

Table 3: PCP Staffing.2:   Analysis of Meeting Bilingual PCPs Goals for FY [CURRENT YEAR]

Department (Unit of Analysis)	Address (Include Floor and Room)	Job Classification Title	Total PCPs Filled in FY [CURRENT YEAR]	Total Bilingual PCPs Goals Determined Prior FY [YEAR] From Table 4 of Prior FY		Total Bilingual PCPs Filled in FY [YEAR]		% of Bilingual PCPs Goals Met for FY [YEAR] (Divide BPCPs Filled by Goals)		Bilingual PCPs Needed to Have Met Goals for FY [YEAR] (Subtract BPCPs Filled from BPCPs Goals)		Number of Months BPCP Goals Not Met
				Spanish	Chinese	Spanish	Chinese	Spanish	Chinese	Spanish	Chinese	
Department A	1661 Oak Street, Oakland, CA 94607	Secretary I										
Department A	1661 Oak Street, Oakland, CA 94607	File Clerk I										
Department A	1661 Oak Street, Oakland, CA 94607	File Clerk II										
Department A	1661 Oak Street, Oakland, CA 94607	Secretary II										
Total Department A	1661 Oak Street, Oakland, CA 94607	All	5	2	1	0	0	0%	0%	2	1	9
Department B	2000 12th Street, Oakland, CA 94607	Secretary I										
Department B	2000 12th Street, Oakland, CA 94607	File Clerk I										
Department B	2000 12th Street, Oakland, CA 94607	File Clerk II										
Department B	2000 12th Street, Oakland, CA 94607	Secretary II										
Total Department B	2000 12th Street, Oakland, CA 94607	All	4	3	2	1	1	33%	50%	2	1	9

Table 4: PCP Staffing 3: Bilingual PCPs Goals Assessment for FY [NEXT YEAR]

Department (Unit of Analysis)	Address (include Floor and Room)	Total PCPs	Total Current BPCPs		% of LES in Service Area Population (City-Wide Depts use City-Wide %, and Local Offices use Local Office %)		Quantitative Component of BPCPs Goals (Multiply Total PCPs by % of LES)		BPCPs Goals Using Quantitative Component for FY [YEAR] (Subtract Goals Number from Total Current Bilingual PCPs)		Qualitative Component of BPCPs Goals		Total BPCPs Goals for FY [YEAR] (Assessing Quantitative and Qualitative Components)	
			Spanish	Chinese	Spanish	Chinese	Spanish	Chinese	Spanish	Chinese	Spanish	Chinese	Spanish	Chinese
Department A	1661 Oak Street, Oakland, CA 94607	20	3	2	12%	10%	2.40	2.00	0	0	1	1	1	1
Department B	2000 12th Street, Oakland, CA 94607	15	0	0	12%	10%	1.80	1.50	2	2	0	0	2	2

Table 5: Super PCP Departments				
Agency/Department/Position	**Bilingual Staff Goal**		**Notes**	**Goal Met Yes/No**
City Administrator's Office (Agency)				
1. Equal Access Unit	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and filled	
	1 SP	1 CH		
2. Citizens Police Review Board	1 SP	1 CH	At least one PCP shall be designated as a Spanish-speaking BPCP and filled by	
	1 SP	1 CH		
3. Administration – OAC	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and filled by selective certification accordingly, on the condition that the function and staffing of this office is substantively unchanged.	
City Clerk's Office (Agency)				
4. City Clerk (1st Floor)	1 SP	1 CH	At least one Spanish-speaking and one Chinese-speaking	
5. City Clerk (2nd Floor)				
Community and Economic Development Agency				
6. Zoning	1 SP	1 CH	At least one Spanish-speaking and one Chinese-speaking	
7. City Planning – Other				
8. Inspection Services Admin – Other	2 SP	2CH	At least one PCP (inspector who works in the field) shall be designated as a BPCP for each threshold language and filled by selective certification accordingly. In addition, at least one PCP who works internally shall be designated as a BPCP for each threshold language and filled by selective certification accordingly.	
9. Inspection Services – Other				
10. Building Inspection – Residential – Other				
11. Engineering Services				
12. Building Inspection – Commercial – Other				
13. District 2				
14. District 3				
15. District 4				
16. Building Codes – Residential – Other				

Agency/Department/Position	Bilingual Staff		Notes	Goal Met. Yes/No
17. Building Services – Other				
18. Inspection Support				
19. Municipal Lending	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and filled by selective certification accordingly.	
20. Residential Rent Arbitration	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and filled by selective certification accordingly.	

Agency/Department/Position	Bilingual Staff		Notes	Goal Met. Yes/No
Finance & Management Agency				
21. Parking Citation Assistance Center	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and filled by selective certification accordingly.	
22. Business License Tax	1 SP	1 CH	At least one Spanish-speaking and one Chinese-speaking employee, shall be easily	
23. Revenue Collections				
24. Citywide Liens				
Fire Department (Agency)				
25. Fire Communications	1 SP	1 CH	The quantitative analysis shall determine the number of PCP dispatchers that shall be	
26. Communications Emergency Dispatch				
Department of Human Services (Agency)				
27. Multipurpose Senior Service Program	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and filled by selective certification accordingly.	
Library (Agency)				
28. Administrative Unit	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language in the Main Library and shall be filled by selective certification accordingly.	
29. Main Library Administration				
30. Art/History/Literature				
31. Magazines and Newspapers				
32. Science Business and Sociology				
33. Childrens Room				
34. Circulation/Automation				

Agency/Department/Position	Bilingual Staff		Notes	Goal Met Yes/No
35. Asian Branch	--	2 CH	At least two PCPs shall be designated as BPCP for Chinese—one for Mandarin and one for Cantonese—and filled by selective certification accordingly.	
36. Cesar Chavez (formerly Latin American Branch)	1 SP	--	At least one PCP shall be designated as a Spanish-speaking BPCP and filled by selective certification accordingly.	

Agency/Department/Position	Bilingual Staff		Notes	Goal Met Yes/No
Office of Parks & Recreation (Agency)				
37. Lincoln Recreation Center	--	1 CH	At least one PCP shall be designated as a Chinese-speaking BPCP and filled by selective certification accordingly.	
38. Manzanita Recreation Center	1 SP	--	At least one PCP shall be designated as a Spanish-	
39. FM Smith Recreation Center	1 SP or 1 CH		At least one PCP shall be designated as either a Spanish-speaking or Chinese-speaking BPCP and filled by selective certification accordingly.	
40. San Antonio Recreation Center	1 SP	--	At least one PCP shall be designated as a Spanish-speaking BPCP and filled by selective certification accordingly.	
41. Carmen Flores Recreation Center	1 SP	--	At least one PCP shall be designated as a Spanish-speaking BPCP and filled by selective certification accordingly.	
Police Department (Agency)				

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42. Communications Unit	1 SP	1 CH	The quantitative analysis shall determine the number of PCP dispatchers that shall be designated as BPCP for each threshold language. In addition to this number of BPCPs, at least one additional PCP shall be designated as a BPCP dispatcher for each threshold language and filled by selective certification accordingly.	
43. Records Unit	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and filled by selective certification accordingly.	
44. Animal Shelter	1 SP	---	At least one PCP shall be designated as a Spanish-speaking BPCP and filled by	
Public Works Agency				
45. Public Works Call Center	1 SP	1 CH	At least one PCP shall be designated as a BPCP for each threshold language and filled by selective certification accordingly.	

Table 6A: Translation 1 Create list of all public documents determined not to be vital documents

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Table 6: Translation.1 All Vital Documents in Department

Department (Unit of Analysis)	Name of Vital Document, ID #	Spanish	Date	Spanish: Checked for accuracy	Date	Spanish: Community feedback	Date	Chinese	Date	Chinese: Checked for accuracy	Date	Chinese: Community feedback	Date
Department A	Department brochures, #11688	Yes	12/31/08	Maya Reyes, department secretary	1/15/2009	Marsha Morales, Unity Council	1/20/2009	Yes	12/31/08	Monique Tsang, EAO	1/15/2009	Wai Fong, Family Bridges	1/20/2009
Department A	Department program application, #11628	Yes	12/31/08	Translation 4U company	1/15/2009	No	3/15/2009	Yes	12/31/08	Translation4Less company	1/15/2009	No	3/15/2009
Department A	Department complaint form, #11638	Yes	12/31/08	Translation4Less company	1/15/2009	No	3/15/2009	Yes	12/31/08	Translation4Less company	1/15/2009	No	3/15/2009
Department A	Department complaint form, #11333	No	3/15/09	No	3/20/2009	No	3/20/2009	No	3/15/2009	No	3/20/2009	No	3/20/2009

Exhibit 4: Model Agency Compliance Plan Template

Table 7: Translation 2

Department (Unit for analysis)	Number of Vital Documents	Spanish	Spanish: Percent Translation	Spanish: Checked for Accuracy	Spanish: Percent Checked for Accuracy	Spanish: Community feedback	Spanish: Percent Community feedback	Chinese	Chinese: Percent Translation	Chinese: Checked for accuracy	Chinese: Percent Checked for accuracy	Chinese: Community feedback	Chinese: Percent Community feedback
Department A	20	15	80%	15	80%	2	10%	10	50%	10	50%	0	0

Table 8: Assessment of Multilingual Telephonic Messages

Department (Unit of analysis)	Public Telephone Number	Message Recorded in Spanish?	Basic Information Included?	Message Recorded in Chinese?	Basic Information Included?	Number of Months Has Not Met Goals	Date for Trilingual Message
Department A	(510) 555-5555	Yes	Yes	Yes	Yes	0	12/1/2008
Department A	(510) 555-5551	No	No	No	No	9	8/1/2009

Exhibit 4: Model Agency Compliance Plan Template

Table 9: Recruitment Firm.1 Summary

Recruitment Firm	Contact Person and Contact Information	Total BPCPs Designated for Recruitment		Total BPCPs Filled		Number of BPCPs Unfilled		% of BPCPs Hired Met (Divide BPCPs Hired by Designated)	
		Spanish	Chinese	Spanish	Chinese	Spanish	Chinese	Spanish	Chinese
Manpower	Jim Nguyen, jnguyen@manpower.com, (510 839-2222 x202), 1616 20th Street, Oakland, CA 94607	10	5	5	5	3	2	50%	40%
Power and Assoc.	Jeannie Chiu, jchiu@power.com (415) 555-4155, 869 11th Street, San Francisco, CA 94102	10	5	5	5	3	2	50%	40%

Exhibit 4: Model Agency Compliance Plan Template

Final (March 17, 2011)

Table 10: Recruitment Firm.2 BPCP Employees

Department (Unit of Analysis)	Address (Include Floor and Room)	Job Classification Title	Language (Spanish/ Chinese)	Date filled	Recruitment Firm
Ticketing office	1661 11th Street, Oakland, CA 94607	Front desk clerk	Chinese	1.1.2008	Manpower

Exhibit 4: Model Agency Compliance Plan Template

AGENCY COMPLIANCE PLAN NARRATIVE ASSESSMENT

By completing the Narrative Assessment of this Agency Compliance Plan, the Agencies will be reporting on the collection, assessment, and reporting on specific data necessary to identify gaps in oral and written language services; development of plans for filling service gaps; and measurement of progress. The Narrative Assessment should be completed in document format using the questions provided.

Assessment of Bilingual Public Contact Positions and Corrective Plans for Hiring Sufficient Bilingual Public Contact Positions

Instructions to Agencies:

1. [DEPARTMENT NAME] had a total of [#] PCPs this FY [YEAR], of which [#] were vacant PCPs and [#] were frozen PCPs. [DEPARTMENT NAME] had a total of [#] BPCPs this FY [YEAR], of which [#] were Spanish and [#] were Chinese. The goals of BPCPs (as determined by last year's assessment) for Spanish were [#] and for Chinese were [#].

2. In Table 4, the Agency was required to determine the "Qualitative Component of BPCPs Goals" pursuant to § 2.30.100 (B)(15)) by Department. *See* Section @, @. The assessment and two-week survey required elements of service such as wait times, level of service and quality of communication to be analyzed. Provide the results of the assessment and survey in narrative form here.

In Tables 3-5, the Agency analyzed whether the Departments were meeting their goals of providing "sufficient bilingual employees" as required by the EAO. Table 3 and 5 records whether the Departments have fully met its BPCPs goals for this fiscal year. If the Departments did not meet their BPCP goals for this fiscal year, then the Departments must answer the following:

3. The Department did not meet the Spanish goal by [number and %] and did not meet the Chinese goal by [number and %]. (*See* § 2.30.100 (B)(4)).

4. Describe the Agency's methods or means employed to ensure a pool of qualified BPCP applicants, and describe the method of processing each qualified applicant (§ 2.30.100 (B)(5)). Describe how the Agency works with the City Administrator, the Equal Access Director and the Office of Personnel and Management to recruit, and hire bilingual qualified applicants. Assess the adequacy of these efforts and indicate areas of improvement.

5. Describe the Agency's methods for assessing and testing language skills for its bilingual employees. (§ 2.30.100 (B)(5)).

6. Describe in detail the Agency's corrective action plan for meeting its BPCP goals the following fiscal year. A correction plan must set forth a concrete and realistic plan to remedy noncompliance. (*See* § 2.30.100 (B)(5)). For example, a correction plan may include any of the following actions: hiring one or more recruitment firms to recruit sufficient bilingual applicants; or modifying testing and selection procedures that disproportionately exclude applicants and are not required by business necessity.

7. Describe any additional interim measures in place to ensure access by LES populations to Department services pending the hiring and/or deployment of sufficient BPCPs. The required interim measures are:

2.   Agencies must maintain a list of employees who speak the threshold languages. At least one employee who can provide service to LES persons shall be available during business hours. Employees shall have access to telephone language interpretation at all times, and should choose a method for communicating best suited to providing service to LES persons.

3.   All Agencies and Departments must demonstrate that they have adequate means to make all services available to LES persons.

4.   All Agencies will have Language Access Coordinators.

5.   All Agencies will adopt and implement Language Access Policies approved by the City Administrator and the Finance and Management Agency.

6.   Each PCP shall be trained in the use of interim measures to assist LES persons.

8.   Provide how many calls were made using the language line and which language was interpreted.

9.   Describe in detail the reasons explaining why the Department did not meet its BPCP goals, including assessment of any structural barriers. For example, noncompliance may be caused by the failure to recruit bilingual personnel; elimination of bilingual applicants during the testing process; or failure to hire bilingual applicants from an eligibility list.

Assessment of Translation of Written Documents
and Corrective Plans for Complete Translation

Instructions to Agencies:

1. [AGENCY NAME] had a total of [#] vital documents this FY [YEAR], of which [#] [%] were translated into Spanish and [#] [%] were translated into Chinese, [#] [%] were checked for accuracy in Spanish and [#] [%] were checked for accuracy Chinese, [#] [%] received community feedback in Spanish and [#] [%] received community feedback in Chinese.

2. Departments are required to "post notices in the public areas of their facilities in [Spanish and Chinese] indicating that written materials in the languages, and staff who speak the languages, are available." These notices must be "posted prominently" and be "readily visible to the public." (§ 2.30.050 (D)).

    (a) List the locations in which the Department has posted notices and indicate whether both Spanish and Chinese notices have been posted.

    (b) . Describe how these postings are prominent and readily visible to the public.

    (c) Include the Department's written policy and procedures regarding posting of these notices.

3. Describe how the Department ensures that there is an adequate stock of readily available translated materials from state and federal agencies. (§ 2.30.060). Include the Department's written policy and procedures regarding these materials.

4. "Departments are encouraged to solicit feedback on the accuracy and appropriateness of translations from bilingual staff at community groups whose clients receive services from the department." (§ 2.30.050(E)). Describe how the Department solicits feedback on the accuracy and appropriateness of translations from bilingual staff at community groups whose clients receive services from the Department. Include the Department's written policy and procedures regarding receiving community feedback.

5. Specify individuals responsible for translating vital documents (E.g., City Administrator's Equal Access Office, Department's Existing bilingual personnel (non-certified), Departments existing bilingual personnel (certified); translation agency, non-profit organization, free lance translator (non-certified), free lance translator (certified)):

6. Does the Department print translated documents in the colored paper guidelines specified by the City Administrator's Equal Access Office? (Chinese (pink); Spanish (blue); Vietnamese (green))

7. What was the Agency's budget for translation of vital documents for the prior FY [YEAR]?

8. What is the Agency's budget for translation of vital documents for current FY [YEAR]?

Table 6 records whether Departments have fully met its translation goals for all of its vital documents. If the Departments did not meet its translation goals for this fiscal year, then the Agencies must answer the following:

9. Provide the number of months the Department has not met its translation goals.

10. Describe the interim measures in place to ensure access by LES populations to translated written materials.

11. Describe in detail the reasons explaining why the Department did not meet its translation goals, including assessment of any structural barriers. Indicate if sufficient resources have been allocated to translate documents, and if not, an assessment of additional resources needed for complete and accurate translation of documents.

12. When a Department fails to translate vital documents, the City Administrator shall arrange for translation of vital documents by a certified translator and charge the cost of translation to the Department budget. Describe in detail the Department's corrective action plan for meeting its translation goals the following fiscal year. A correction plan must set forth a concrete and realistic plan to remedy noncompliance.

Assessment of Multilingual Telephone Messages

The Equal Access Office shall ensure that all Departments "maintain recorded telephonic messages in [threshold languages]." The message is required to contain the following: "basic information about the [D]epartment's operation including, at a minimum, business hours, location(s), services offered and the means of accessing such services, and the availability of language assistance." § 2.30.080.

Instructions to Agencies:

1.   If the Department has not recorded a message in Spanish and Chinese that contains basic information about the Department's operation including, at a minimum, business hours, location(s), services offered and the means of accessing such services, and the availability of language assistance, then describe the interim measures in place to ensure access by LES populations.

2.   Describe in detail the reasons explaining why the Department did not meet its goals, including assessment of any structural barriers. Indicate if sufficient resources have been allocated, and if not, an assessment of additional resources needed.

3.   Describe in detail the Department's corrective action plan for meeting its translation goals the following fiscal year. A correction plan must set forth a concrete and realistic plan to remedy noncompliance.

Assessment of Department Communication with LES Populations

Instructions to Agencies:

1. Describe in detail the procedures used to facilitate communication with LES Spanish and Chinese populations and assess the adequacy of the procedures. Describe the mechanism the Department uses to assess the adequacy of these procedures and how often it is assessed. (*See* § 2.30.100 (B)(7)).

2. Describe the written policies on providing services to LES Spanish and Chinese populations. (§ 2.30.100 (B) (14)).

3. Describe and assess the Department's outreach efforts to inform LES Spanish and Chinese populations of their right to bilingual services. (*See* § 2.30.130 (B)).

4. Departments are required to "allow persons to make complaints alleging violation [of the EAO] in [Spanish and Chinese]. The complaints may be made by telephone or by completing a complaint form." (§ 2.30.090 (A)). Describe and assess the procedures for accepting and resolving complaints of community members regarding bilingual oral and written services. (*See* § 2.30.100 (B) (13)). Include how the Department makes the public aware of their right to make complaints by telephone or by completing a complaint form.

5. Departments must "document actions taken to resolve each complaint and maintain copies of complaints and documentation of their resolution for a period of not less than two years." (§ 2.30.090 (B)). Describe the Department's procedure for documenting actions taken to resolve each complaint and maintaining copies of the complaint and documentation of their resolution.

6. Departments must forward "[a] copy of each complaint . . . to the City [Administrator] within thirty (30) days of its receipt." (§ 2.30.090 (B)). Provide a list of the Department's complaints forwarded to the City Administrator specifying when the complaint was filed and whether the complaint was forwarded to the City Administrator within 30 days of its receipt. Attach as Appendix @.

Assessment of
Dissemination of Agency Compliance Plan

<u>**Instructions to Agencies:**</u>

1. When will the current FY [YEAR] Agency Compliance Plans be posted on the agency's website and the EAO website?

2. Are prior years Agency Compliance Plans posted on the agency's website and the EAO website?

3. When will the current FY [YEAR] ACP be available to the public upon request in each Department facility?

Describe how notice has been posted prominently at the Agency's geographic location and on the agency's website and the EAO website that ACPs are available with information stating how to access the ACPs.

Model City Administrator's Annual Compliance Plan Template

To: City Council

From: City Administrator

Subject: Annual Compliance Plan Report pursuant to the Oakland City Ordinance No.
              12324 Section 2.30 of the Oakland Municipal Code, entitled "Equal Access to
              City Services."

Date Submitted:

PURPOSE

The City Administrator is charged with implementation, assessment, monitoring, and enforcement of The Equal Access to Services Ordinance (Oakland City Ordinance No. 12324 Section 2.30 of the Oakland Municipal Code, "EAO") that was enacted for the purpose of providing equal access to city services to all Oakland residents, including those with limited proficiency in English. The City Administrator has issued Administrative Instruction Number: xxx, Reference Number: xxx to Departments providing direction about how to implement the EAO and adopted Agency Compliance Plan Templates to collect and analyze the necessary information and data to prepare the Annual Compliance Plan Report that the City Administrator is required to file by June 1 of each year under the EAO.

FISCAL IMPACTS

[TO BE FILLED]

BACKGROUND OF THE EQUAL ACCESS ORDINANCE

[TO BE FILLED]

SUMMARY OF FINDINGS, ANALYSIS, AND RECOMMENDATIONS

1.   There are [#] LEP Spanish, [#] LEP Chinese. Spanish and Chinese meet the limited English speaking threshold of 10,000 as required by the EAO.

2.   The total number of Public Contact Positions (PCPs) in the City are [#]. The total number of Bilingual Public Contact Positions are [#] Spanish, and [#] Chinese.

3.   The total number of Public Contact Positions filled during the fiscal year in the City are [#]. The total number of Bilingual Public Contact Positions (BPCPs) filled during the fiscal year in the City are [#].

4.   The total number of vital documents that require translation into Spanish is [#] and Chinese is [#]

5.   The total number of vital documents that have been translated into Spanish is [#] and Chinese is [#]

6. The total number of telephone messages that require a recorded interpretation in Spanish is [#] and Chinese is [#]

7. The total number of telephone messages that have a recorded interpretation in Spanish is [#] and Chinese is [#]

8. Provide a summary narrative assessment and analysis of how and whether Departments are complying with the EAO based on the findings and assessments discussed in the full report.

9. Provide a description of implementation "best practices" developed by Agencies.

10. Provide a summary narrative description and assessment of any structural barriers that may be preventing Departments from complying with the EAO and recommend means to address barriers.

11. Provide a summary narrative description and assessment of corrective plans that Agencies have developed to address non-compliance with the EAO and corrective plans adopted by the City Administrator to address identified structural barriers.

12. Describe the enforcement mechanisms that the City Administrator has used or will use to enforce the EAO.

13. Provide any other information required by the City Council and or Finance and Management Committee.

ANNUAL COMPLIANCE PLAN REPORT

1. Provide the number and languages of the limited English speaking group
    which meet the threshold of 10,000 as required by the Equal Access
    Ordinance and the source of these numbers. (§ 2.30.100 (B)(1)). Assess
    whether there is a need to update threshold languages based on established
    threshold and use of additional reliable data.

The table lists the languages that meet the 10,000 threshold or are close to meeting the
threshold. The following reliable data was used determine the threshold languages:

Language	Number	Data Source
1. Spanish	87,467	2000 Census
2. Chinese	31,834	2000 Census
3. Vietnamese		2000 Census

2. Provide a narrative assessment and analysis of departmental compliance
    with the EAO based on the findings and assessments discussed in the full
    report.

3. Provide a description of implementation "best practices" developed by
    Departments.

4. Provide a narrative description and assessment of any structural barriers
    that may be preventing Departments from complying with the EAO and
    recommend means to address barriers.

5. Provide a narrative description and assessment of corrective plans that
    Departments have developed to address non-compliance with the EAO and
    corrective plans adopted by the City Administrator to address identified
    structural barriers.

6. For Departments that have been noncompliant with the EAO, describe the
    City Administrator's plan for enforcement for the Departments and
    Agencies. Include a description of the enforcement mechanisms that the City
    Administrator has used or will use to enforce the EAO.

Bilingual Public Contact Position Assessment

7. Provide the numbers of Public Contact Positions by each Department and by each Agency. (§ 2.30.100 (B)(2)).

[INSERT SUMMARY PARAGRAPH OF NUMBERS OF PCPs BY AGENCY]

See Attachment @, which includes Table 2 of all Agency Compliance Plans and includes data on current Public Contact Position (PCP) staffing by Department and by Agency. Attachment 3 also includes a summary table of all Departments by Agency and a summary table of all Agencies.

8. Provide a list of all PCPs filled during the current fiscal year, a list of filled BPCPs, and a copy of each of the qualified applicants pool lists for each position filled, identifying whether each applicant had bilingual capabilities. (§ 2.30.100 (B)(6)).

See Attachment 4, which includes Table 3 of all Agency Compliance Plans and includes data on current BPCP staffing by Department and by Agency. Attachment @ also includes a summary table of all Departments by Agency and a summary table of all Agencies. A copy of each applicant pool list by Department is included as Attachment @, Appendix @ of the Agency Compliance Plans.

9. Provide the numbers of BPCPs by each Department and by each Agency, including the numbers of BPCPs hired this fiscal year. (§ 2.30.100 (B)(3)).

See Attachment @, which includes Tables 4 and 5 of all Agency Compliance Plans and includes data on current BPCP staffing by Department (including Super PCP Departments) and by Agency. Attachment @ also includes a summary table of all Agencies.

10. Provide a quantitative and qualitative assessment of the additional BPCPs needed to provide the same level of service to Spanish and Chinese LES populations as is provided English speakers. (§ 2.30.100 (B)(4)). In addition, provide a narrative summary of these BPCP goals.

[INSERT SUMMARY PARAGRAPH]

See Attachment @, which includes Tables 4 and 5of all Agency Compliance Plans and includes data on BPCP goals for this fiscal year by Department (including Super PCP Departments) and by Agency. Attachment @ also includes a summary table of all Agencies.

11. For Departments that have identified a need for additional BPCPs, describe and assess the Departments' methods or means employed to ensure a pool of qualified BPCP applicants, and the method of processing each qualified applicant (§ 2.30.100 (B)(5)). If the process of ensuring a qualified bilingual pool of applicants is centralized, what is the process for accomplishing these goals? Identify best practices and any concerns with particular Departments and specific corrective plans.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' methods or means employed to ensure a pool of qualified BPCP applicants, and the method of processing each qualified applicant, see <u>Narrative Assessment</u> of <u>Agency Compliance Plans, Attachment @, Section @.</u>

12.   Assess Departments' methods for assessing and testing language skills for its bilingual employees. (*See* § 2.30.100 (B)(5)). Identify Department best practices and concerns with any particular Departments.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' methods for assessing and testing language skills for its bilingual employees, see <u>Narrative Assessment</u> of <u>Agency Compliance Plans, Attachment @, Section @.</u>

13.   For Agency Compliance Plans submitted the prior fiscal year, identify any Departments that have not met their BPCP goals and the length of time of noncompliance.

See Attachment @, which includes <u>Table 3</u> of all Agency Compliance Plans and includes data on whether BPCP goals have been met by Department and by Agency. Attachment @ also includes Supplemental Summary <u>Table 3.1</u>, entitled <u>Summary of Departments Noncompliant with BPCP Goals</u>, including the number of months the Department has not met its BPCP goals.

14.   For Departments that have identified a need for additional BPCPs, describe, and assess the Departments' corrective action plans included in the Agency Compliance Plans for meeting the BPCP goals. (*See* § 2.30.100 (B)(5)). Identify best practices and any concerns with particular Departments and specific corrective plans

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' corrective action plans included in the Agency Compliance Plans for meeting the BPCP goals, see <u>Narrative Assessment</u> of <u>Agency Compliance Plans, Attachment @.</u>

15.   For Departments that have identified a need for additional BPCPs, describe and assess the Departments' interim measures in place to ensure access by LES population to Department services. Identify best practices and any concerns with particular Departments and specific corrective plans.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' interim measures in place to ensure access by LES population to Department services, see <u>Narrative Assessment</u> of <u>Agency Compliance Plans, Attachment @.</u>

16.   For Departments that have identified a need for additional BPCPs, describe and assess any structural barriers identified and recommend means to address barriers.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' structural barriers identified and recommend means to address barriers, see <u>Narrative Assessment</u> of <u>Agency Compliance Plans, Attachment @</u>.

17. For Departments that have been noncompliant with BPCP goals, what is the City Administrator's plan for enforcement for each Department and Agency?

[INSERT SUMMARY PARAGRAPH]

18. Describe and assess how the Office of Personnel, Resources and Management has complied with its duties to facilitate the hiring of BPCPs as prescribed in Administrative Instruction [#]. Identify any particular concerns and discuss any corrective plans.

[INSERT PARAGRAPH]

19. If any recruitment firms are used to search for qualified applicants for City employment positions, provide the name, address, telephone number, and contact person of each recruitment firm used. (§ 2.30.100 (B)(8)).

See Attachment @, <u>Table 9</u>: Recruitment Firm.1 Summary.

20. If any recruitment firms are used to search for qualified applicants for City employment positions, provide the total number of city employees hired from the firm in the current year, including the employee's title and department of employment, and the number of BPCPs, including their title and department of employment. (§ 2.30.100 (B)(9)).

See Attachment @, <u>Table 10</u> Recruitment Firm.2 Employees.

21. If any recruitment firms are used to search for qualified applicants for City employment positions, assess the adequacy of each firm to recruit applicants for BPCPs in Spanish and Chinese. If the firm has been inadequate in recruiting applicants, provide a description of the actions to be taken to improve performance. (§ 2.30.100 (B)(10-11)).

[INSERT PARAGRAPH]

Translation of Public Document Assessment

22.　Provide a list of each Department's written materials required to be translated, the languages into which they have been translated, and the persons who have reviewed the translated material for review of accuracy and appropriateness. (§ 2.30.100 (B)(12)).

See Attachment @, which includes Table 6 of all Agency Compliance Plans and includes data on translation of written materials, including languages they have been translated and persons who reviewed the translation for accuracy and appropriateness by Department and by Agency.

See Attachment @, which includes Table 7 of all Agency Compliance Plans and includes numbers and percentages by Department and by Agency of documents that have been translated, checked for accuracy and reviewed for appropriateness.

23.　Assess Departments' policies and procedures for posting notices in Spanish and Chinese in public areas of their facilities indicating that translated written materials and staff who speak the languages are available. (§ 2.30.050 (D)). Identify best practices and any concerns with particular Departments and specific corrective plans.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' policies and procedures for posting notices, see Narrative Assessment of Agency Compliance Plans. Attachment @.

24.　Assess Departments' policies and procedures for ensuring that there is an adequate stock of readily available translated materials from state and federal agencies. (§ 2.30.060). Identify best practices and any concerns with particular Departments and specific corrective plans.

[INSERT SUMMARY PARAGRAPH].

For complete information regarding Departments' policies and procedures for ensuring that there is an adequate stock of readily available translated materials from state and federal agencies, see Narrative Assessment of Agency Compliance Plans, Attachment @.

25.　Assess Departments' policies and procedures for translation of documents, checking for accuracy and appropriateness. Identify best practices and any concerns with particular Departments and specific corrective plans.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' policies and procedures for translation of documents, checking for accuracy and appropriateness, see Narrative Assessment of Agency Compliance Plans, Attachment @.

26.　For Departments that have identified a need for accurate and appropriate translation of written documents, assess the Departments' corrective action plans included in the Agency Compliance Plans for meeting the translation goals. Identify best practices and any concerns with particular Departments and specific corrective plans.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' corrective action plans included in the Agency Compliance Plans for meeting the translation goals, see <u>Narrative Assessment</u> of <u>Agency Compliance Plans, Attachment @.</u>

27.   For Departments that have identified a need for accurate and appropriate translation of written documents, assess the Departments' interim measures in place to ensure access by LES population to Department services. Identify best practices and any concerns with particular Departments and specific corrective plans.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' interim measures in place to ensure access by LES population to Department services, see <u>Narrative Assessment</u> of <u>Agency Compliance Plans. Attachment @.</u>

28.   For Departments that have identified a need for accurate and appropriate translation of written documents, assess any structural barriers identified and recommend means to address barriers.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' structural barriers identified and recommend means to address barriers, see <u>Narrative Assessment</u> of <u>Agency Compliance Plans, Attachment @.</u>

29.   For Departments that have been noncompliant with translation goals, what is the City Administrator's plan for providing technical assistance and/or enforcement for each Department and Agency?

[INSERT PARAGRAPH]

Multilingual Recorded Telephone Messages Assessment

30. Assess whether Departments have maintained multilingual recorded telephone messages in each threshold language that contain the following: basic information about the Department's operation including, at a minimum, business hours, location(s), services offered and the means of accessing such services, and the availability of language assistance. (§ 2.30.080). Identify best practices and any concerns with particular Departments.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' multilingual recorded telephone messages, see Attachment @, which includes Table 8 of all Agency Compliance Plans and arrative Assessment of Agency Compliance Plans.-

31. For Departments that have identified a need for multilingual recorded telephone messages, assess the Departments' corrective action plans included in the Agency Compliance Plans for meeting the goals. Identify best practices and any concerns with particular Departments and specific corrective plans.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' corrective action plans included in the Agency Compliance Plans for meeting the goals, see Narrative Assessment of Agency Compliance Plans, Attachment @.

32. For Departments that have identified a need for multilingual recorded telephone messages, assess the Departments' interim measures in place to ensure access by LES population to Department services. Identify best practices and any concerns with particular Departments and specific corrective plans.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' interim measures in place to ensure access by LES population to Department services, see Narrative Assessment of Agency Compliance Plans, Attachment @.

33. For Departments that have identified a need for multilingual recorded telephone messages, assess any structural barriers identified and recommend means to address barriers.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' structural barriers identified and recommend means to address barriers, see Narrative Assessment of Agency Compliance Plans, Attachment @.

Assessment of Department Communication with LES Populations

34. Assess the adequacy of Departments' procedures used to facilitate communication with LEP Spanish and Chinese populations. (§ 2.30.100

(B)(7)). Identify Department best practices and concerns with any particular Departments, and discuss any corrective plans.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' procedures used to facilitate communication with LEP Spanish and Chinese populations, see Narrative Assessment of Agency Compliance Plans, Attachment @.

35. Assess the adequacy of Departments' policies on providing services to LEP Spanish and Chinese populations. (§ 2.30.100 (B) (14)).

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' policies on providing services to LEP Spanish and Chinese populations, see Narrative Assessment of Agency Compliance Plans, Attachment @.

36. Assess the adequacy of Departments' service to LEP Spanish and Chinese populations. (§ 2.30.100 (B) (15)). Identify Department best practices and concerns with any particular Departments.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding the adequacy of Departments' service to LEP Spanish and Chinese populations, see Narrative Assessment of Agency Compliance Plans, Attachment @.

37. Assess the adequacy of Departments' outreach efforts to inform LEP Spanish and Chinese populations of their right to bilingual services. (§ 2.30.130 (B)). Identify Department best practices and concerns with any particular Departments.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' outreach efforts to inform LEP Spanish and Chinese populations of their right to bilingual services, see Narrative Assessment of Agency Compliance Plans, Attachment @.

38. Assess the adequacy of the Departments' procedures for accepting and resolving complaints of community members regarding bilingual oral and written services. (§ 2.30.100 (B) (13)). Identify Department best practices and concerns with any particular Departments.

[INSERT SUMMARY PARAGRAPH]

For complete information regarding Departments' procedures for accepting and resolving complaints of community members regarding bilingual oral and written services, see Narrative Assessment of Agency Compliance Plans, Attachment @.

Dissemination of Annual Compliance Plan

39. Describe how the City Administrator's Annual Compliance Plan has been published and distributed to the public.

City Administrator Additional Duties

40. How has the City Administrator provided training and guidance to Departments to facilitate implementation of the EAO and how have Departments collaborated?

41. Assess the adequacy of the process the City Administrator utilizes to monitor departmental compliance with the EAO.

42. Asses the adequacy of performance of the Equal Access Office and OPRM in implementing the EAO.

43. Has the City Administrator and/or Departments provided all additional, if any, information requested by the Finance and Management Committee?